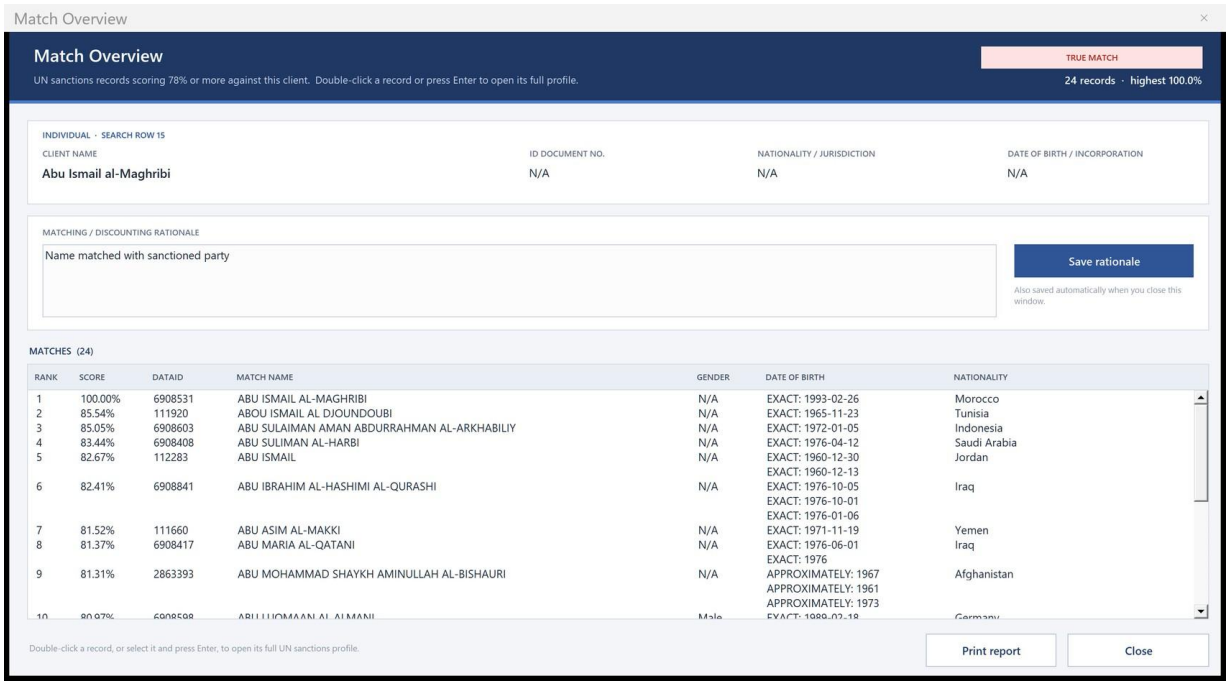
THE LAW SOCIETY OF HONG KONG

Client Name Screening Tool

User Guide

Screen clients against the United Nations Security Council Consolidated List, review matches, keep an audit trail and prepare an AI-assisted due diligence report.



Edition: 30 October 2026 · For Excel on Windows and Mac

Available free of charge to Law Society members through the Member Zone.

IMPORTANT

Disclaimer on Use of the Client Name Screening Tool

The Client Name Screening Tool (the "Tool") is provided by the Law Society of Hong Kong solely as an aid to support members in compliance obligations related to targeted financial sanctions, terrorism financing, and proliferation financing of weapons of mass destruction. The Tool is primarily designed to screen names against the United Nations Security Council Consolidated Sanctions List ("UN Consolidated Sanctions List"), which contains the names of all individuals, groups, undertakings, and entities that are subject to sanctions measures imposed by the UN Security Council.

The Tool is intended for reference purposes only and does not constitute legal advice or a substitute for members' own compliance procedures. While the Law Society endeavours to ensure that the Tool is accurate, current, and of practical utility, no representation, warranty, or guarantee is given as to its completeness or reliability.

The Law Society expressly disclaims any liability for decisions made, actions taken, or outcomes arising from the use of the Tool or reliance on its outputs. Members remain independently responsible for conducting appropriate due diligence and ensuring full compliance with all applicable laws, regulations, and professional obligations.

Firms that already have access to commercial screening solutions are encouraged to continue using those existing arrangements, which may offer more comprehensive coverage. Members who do not have access to such solutions, or who wish to supplement their existing processes, are welcome to adopt this Tool as part of their overall compliance framework.

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START HERE

1 Quick start

Screening a client takes five steps. Each step is explained in detail later in this Guide.

	What to do	Where
1	**Open the Tool and enable macros.** Click Enable Content if Excel shows a yellow security bar. The UN list then updates by itself.	Section 3
2	**Enter the client details** from row 7, one person or entity per row. Individuals in column A (Chinese name in B), entities in column G.	Section 5
3	**Click Start Screening.** Each row receives an Alert (column J) and a Highest Similarity Score (column L).	Section 6
4	**Review every True Match and Potential Positive Match.** Double-click the score in column L to open the Match Overview, then double-click a record for its full profile. Record your rationale and click Save rationale.	Sections 7–8
5	**Keep an audit trail.** Print the Match Overview Report for each reviewed client, and click Export Results for Record Keeping to save the whole sheet.	Sections 9, 11

What the alerts mean

Alert (column J)	Score	What to do
True Match	99% or higher	Exact or near-exact match with a sanctioned party. Review immediately.
Potential Positive Match	80% to 99.8%	Possible match. Review the profile and record why it is, or is not, the client.
False Positive Match	Below 80%	Partial name similarity only. Usually not the sanctioned party.
No Match Found	—	No significant similarity with any sanctioned party.

TIP · Keyboard and mouse shortcuts

Double-click column L (Highest Similarity Score) to open the Match Overview for that client.

Double-click column S/T or Z/AA (Top 1 or Top 2 score or DataID) to open that record's profile directly.

Double-click column I (AI Due Diligence Report) to prepare an AI research prompt.

In the Match Overview, **select a record and press Enter** to open its profile.

SECTION 2

2 About the Tool

The Tool is primarily designed as a sanctions screening solution to assist legal professionals in screening names against the United Nations Security Council Consolidated List ("UNSC Consolidated List") by enabling quick and accurate identification of potential matches with sanctioned individuals, entities, terrorist groups, or their associates, including sanctioned vessels.

Beyond sanctions screening, the Tool incorporates AI-driven searches of publicly available information to identify adverse news linked to a client and help to detect politically exposed persons ("PEPs"). All searches and findings are consolidated and presented in an AI-generated AML client due diligence report (the "Due Diligence Report") – please refer to Section 12 of this Guide for a detailed explanation of what the Due Diligence Report contains and where the information is sourced from.

While the Tool is capable of identifying individuals, entities, and organisations designated under foreign sanctions and global sanctions lists, members should note that foreign sanctions regimes are not part of the international targeted financial sanctions framework and have no legal status in Hong Kong. Accordingly, the Law Society does not promote the Tool for compliance with the foreign sanctions regimes, and members remain solely responsible for addressing any extraterritorial sanctions obligations, including the accuracy of searches conducted.)

The Tool is an Excel-based solution with integrated VBA (Visual Basic for Applications)-enabled automated functions designed to streamline sanctions screening and client due diligence processes. VBA is a programming language built into Microsoft Excel that allows the Tool to automate complex tasks—such as connecting to online databases, performing intelligent name matching, and generating reports.

Two levels of checking

Check	What it covers
Primary check	Automated screening against the UNSC Consolidated List to identify matches with designated individuals, entities, and terrorist groups.
Advanced check	A comprehensive, AI-driven analysis of publicly available information encompassing the following key areas: (i) Cross-Jurisdictional Sanctions Verification; (ii) Politically Exposed Person ("PEP") check; (iii) Close Associate and Family Member Search of PEP search; (iv) Adverse Media Screening; (v) Generic Analysis of Terrorist Financing/Proliferations Financing Risk Exposure.

The Due Diligence Report serves as a supplementary aid, providing a robust starting point for users to identify potential higher-risk indicators for Money Laundering/Terrorist Financing/Proliferation Financing ("ML/TF/PF") risk analysis and inform users whether it may warrant enhanced due diligence measures.

The Tool is user-friendly and does not require advanced technical expertise. Its intuitive interface automates the screening process, minimizing manual effort and reducing the likelihood of errors or technical issues.

For legal professionals, this Tool delivers substantial benefits: it saves time by automating labour-intensive tasks, improves accuracy through sophisticated matching algorithms, and ensures adherence to UN sanctions requirements. By simplifying these processes, it empowers users to concentrate on their core legal responsibilities with greater confidence in the Tool's reliability.

Key features

Feature	Benefit
User-friendly format	Built in Excel, requiring no additional software. Scans the UNSC Consolidated List with one click and highlights high-probability matches for review.
Single and batch checking	Check one name or a whole client portfolio in one run, ideal for routine due diligence.
Always up to date	The UN list (English and Chinese) is downloaded each time the file is opened and every hour while it stays open, with a manual Refresh button. The sheet shows the date of the UN list in use.
Straightforward assessment	The top two matches and their similarity scores appear next to each client; every match of 78% or more can be reviewed in the Match Overview.
Record keeping	Branded printable reports, a rationale for every client and a one-click export create a clear audit trail for reviews or inspections.
Due Diligence Report	Prepares a Know Your Client (KYC) research prompt for AI platforms covering sanctions, adverse news and PEP status.

SECTION 3

3 Getting started

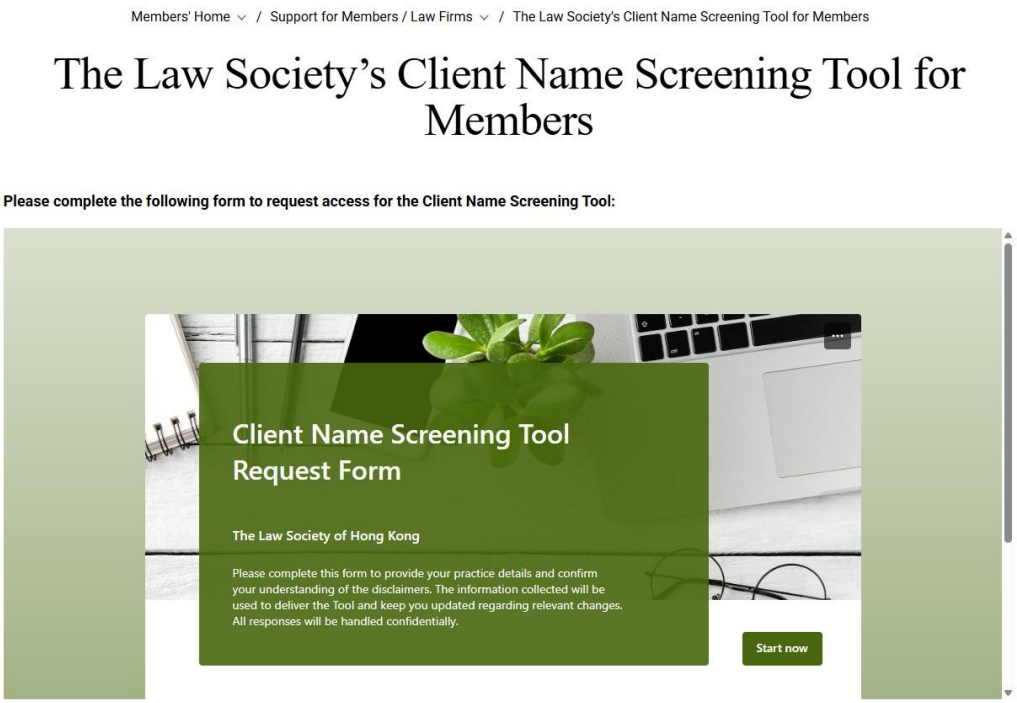
3.1 Where to find the Tool

The Tool is available free of charge to all Law Society members. Please login the Member Zone and fill in the "Request Form" for accessing the Tool.

Access path: Law Society Website > Member Zone > Support for Members/Law Firms > The Law Society's Client Name Screening Tool for Members

Direct Link: The Law Society's Client Name Screening Tool for Members

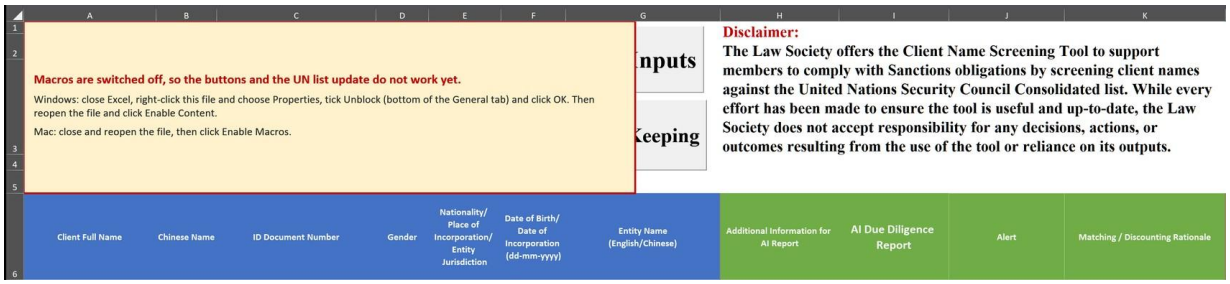
The AML team will provide you the access link once the "Request Form" has been received. Save the Excel file to a secure location on your computer or firm's network drive. We recommend creating a dedicated folder (e.g., "AML Screening Tools") for easy access and version control.



The Tool's page in the Member Zone

3.2 Opening the Tool for the first time

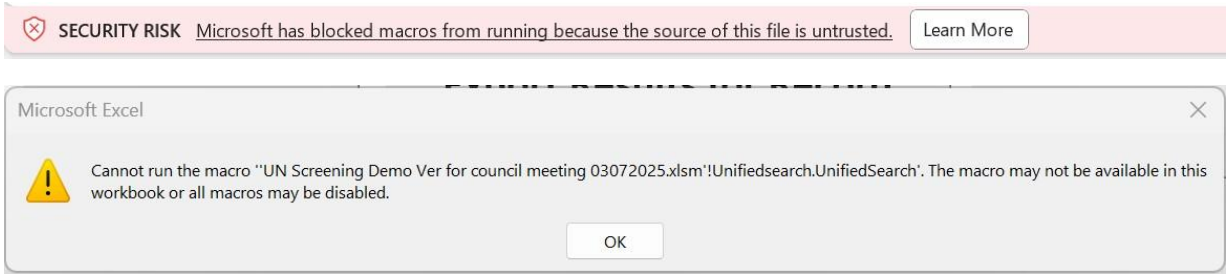
Excel protects you from macros in files downloaded from the internet. The Tool relies on macros, so you may need to allow them once. Until you do, a yellow notice covers the buttons at the top of the Search sheet and explains what to do:



The notice shown while macros are switched off. It disappears as soon as macros are enabled.

The notice and the messages below are standard Excel security features and are quickly resolved.

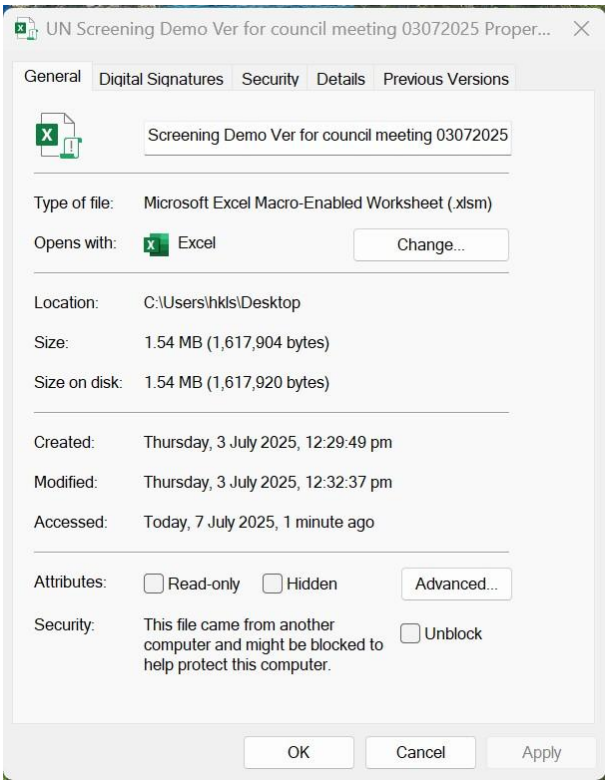
Message 1 – "Microsoft has blocked macros because the source of this file is untrusted"



Why: Windows marks files downloaded from the internet as potentially unsafe. This security feature blocks macros until you explicitly authorize the file.

How to fix:

1. Close Excel completely.
2. Find the Tool file on your computer.
3. Right-click the file and choose **Properties**.
4. At the bottom of the **General** tab, tick **Unblock** and click **OK**.
5. Reopen the Tool. The macros now work normally.

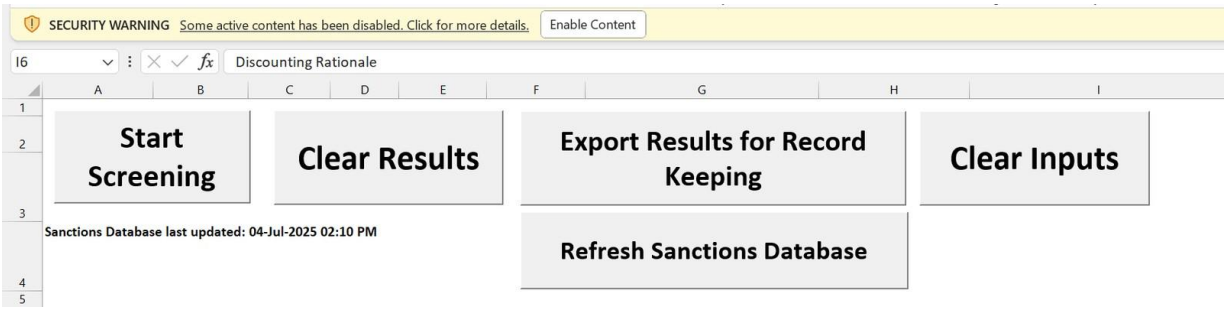


Tick "Unblock" in the file's Properties window, then click OK

Message 2 – "Some active content has been disabled"

What you see: A yellow banner at the top of the Excel window stating "SECURITY WARNING: Some active content has been disabled. Click for more details."

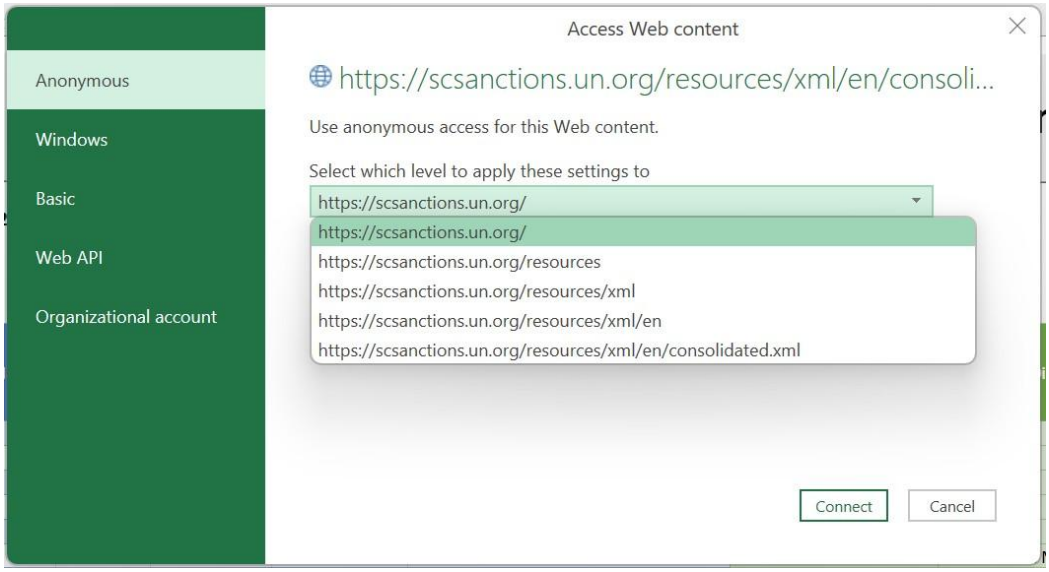
Why: Excel automatically disables macros and active content in files from external sources as a security precaution. Click **Enable Content** to switch on the Tool's functions.



Click "Enable Content" in the yellow security bar

Message 3 – "Access Web Content" (rarely needed)

The Tool now downloads the UN lists directly, so this window normally does not appear. If your firm's network blocks the direct download, the Tool switches to Excel's built-in data connection, and Excel may ask once how to connect to the UN website. Select the highlighted address and click **Connect**.



Choose the highlighted address and click Connect

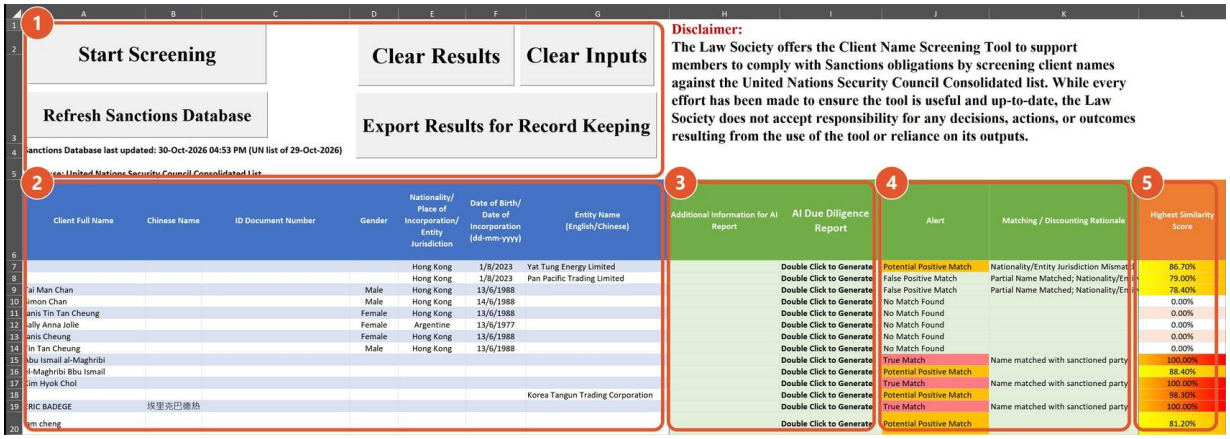
NOTE · On a Mac

Close and reopen the file, then click **Enable Macros**. If the UN list does not update, follow the one-off steps in “Mac setup - UN list download.txt” supplied with the Tool.

SECTION 4

4 The Search sheet at a glance

Everything happens on the **Search** sheet. It is divided into colour-coded panels, read from left to right.



Search sheet, columns A to L



Search sheet, columns M to AH

1	**Buttons and status**	Start, clear, export and refresh. The line below the buttons shows when the UN list was last updated.
2	**Input panel (A–G)**	Client details: one individual or entity per row, from row 7.
3	**AI report (H–I)**	Optional extra information for the AI report, and the cell you double-click to prepare it.
4	**Alert and rationale (J–K)**	The screening result and the reason for it. You can change the alert and edit the rationale.
5	**Highest score (L)**	The best similarity score. Double-click it to open the Match Overview.
6	**Screening date (M)**	When the row was screened: your audit trail.
7	**Customisable columns (N–R)**	Free columns for your own references, e.g. client or file number.

8	**Top 2 results (S–AH)**	The two best matches with their key details. Double-click a score or DataID to open the profile.

4.1 The buttons



Button	What it does
Start Screening	This button initiates the screening process once all client names and details have been entered.
Clear Results	Removes all results (columns J to AH). **Excel's Undo cannot restore them.**
Clear Inputs	Removes all client details from the input panel. **Excel's Undo cannot restore them.**
Export Results for Record Keeping	Saves the inputs, alerts, rationales and matches to a new Excel file for your records (see Section 11.5).
Refresh Sanctions Database	Downloads the latest UN list now. The list also updates automatically each time the file opens and every hour while it is open.

4.2 Is my UN list up to date?

The line under the buttons tells you, for example: **Sanctions Database last updated: 30-Oct-2026 04:53 PM (UN list of 29-Oct-2026)**. The date in brackets is the date the United Nations published the list you are screening against.

> **IMPORTANT · If an update fails**
> The line turns **red** and reads "update failed – check the internet connection and click Refresh". Screening still works with the last list downloaded; reconnect and click **Refresh Sanctions Database** before relying on the results.

SECTION 5

5 Entering client details

The Input Panel (columns A to G in the Search worksheet) is where users enter client details for screening against UN sanctions lists. This section allows input of individual names (columns A), Chinese Name (column B), ID Document Number (column C), Gender (column D), Nationality/ Place of Incorporation/ Entity Jurisdiction (column E), Date of Birth/ Date of Incorporation (dd-mm-yyyy) (column F) and Entity names (column G).

5	Database: United Nations Security Council Consolidated List						
6	Client Full Name	Chinese Name	ID Document Number	Gender	Nationality/ Place of Incorporation/ Entity Jurisdiction	Date of Birth/ Date of Incorporation (dd-mm-yyyy)	Entity Name (English/Chinese)
7					Hong Kong	1/8/2023	Yat Tung Energy Limited
8					Hong Kong	1/8/2023	Pan Pacific Trading Limited
9	Tai Man Chan			Male	Hong Kong	13/6/1988	
10	Simon Chan			Male	Hong Kong	14/6/1988	
11	Janis Tin Tan Cheung			Female	Hong Kong	13/6/1988	
12	Sally Anna Jolie			Female	Argentine	13/6/1977	
13	Janis Cheung			Female	Hong Kong	13/6/1988	
14	Tin Tan Cheung			Male	Hong Kong	13/6/1988	
15	Abu Ismail al-Maghribi						
16	el-Maghribi Bbu Ismail						
17	Kim Hyok Chol						
18							Korea Tangun Trading Corporation
19	ERIC BADEGE	埃里克巴德热					
20	lam cheng						

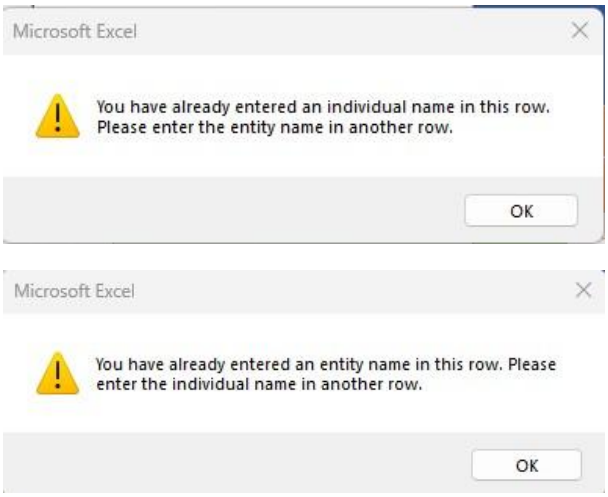
Input panel with individual and entity clients

5.1 Rules for good results

Rule	How
One party per row	Enter the entity, each beneficial owner and each connected party in separate rows, starting from row 7. Never combine an individual (column A) and an entity (column G) in the same row; the Tool will warn you if you do. **Example:** for “ABC Corp” with beneficial owners John Doe and Jane Smith, use three rows.
Individual names	Enter the individual English name in the “Client Full Name” (column A), please omit the title (e.g. Ms/Mr/Miss/Dr). If applicable, provide the client's Chinese name in the “Chinese Name” field (Column B) in the same row.
Entity names	For corporate clients (legal persons), enter the full legal name in the "Entity Name" field (Column G), as it appears in official documentation. Both English and Chinese characters are supported in this column. If the entity has both English and Chinese names, input them in separate rows. Avoid abbreviations unless they are an integral part of the legal name. **Example:** enter “XYZ International Ltd”, not “XYZ Int. Ltd.”

Rule	How
Consistent spelling	Use the same spelling every time (e.g. “William”, not “Wm.” or “Will”). Avoid extra spaces and special or non-printable characters.
Gender (column D)	“M” or “F”, or “Male” or “Female”. A drop-down list is provided.
Nationality (column E)	Use the full country name, e.g. “United States”, not “USA” or “US”. This matches the sanctions data and avoids ambiguity.
Date of birth / incorporation (F)	Enter as a date (dd-mm-yyyy). Year differences of more than three years are flagged in the rationale.

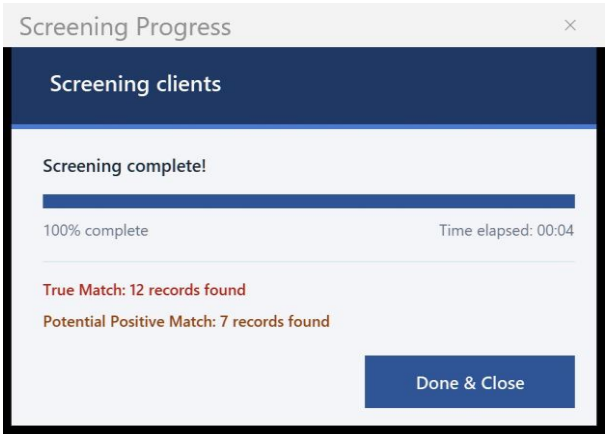
If an individual and an entity are entered in the same row, one of these messages appears. Move one of the names to a new row.



SECTION 6

6 Reviewing results

Click **Start Screening**. A progress window shows how far the screening has run; when it finishes it summarises the number of True and Potential Positive Matches. Click **Done & Close**.



Screening progress window

6.1 Alerts and rationale

After inputting the client details in the Input Panel, users can click on the “Start Screening” button to execute the screening. The “Alert” column in column J will pop-up alerts with the following 4 categories: “True Match”, “Potential Positive Match”, “False Positive Match” and “No Match Found”.

Additional Information for AI Report	AI Due Diligence Report	Alert	Matching / Discounting Rationale	Highest Similarity Score
	Double Click to Generate	Potential Positive Match	Nationality/Entity Jurisdiction Mismatch	86.70%
	Double Click to Generate	False Positive Match	Partial Name Matched; Nationality/Entity	79.00%
	Double Click to Generate	False Positive Match	Partial Name Matched; Nationality/Entity	78.40%
	Double Click to Generate	No Match Found		0.00%
	Double Click to Generate	No Match Found		0.00%
	Double Click to Generate	No Match Found		0.00%
	Double Click to Generate	No Match Found		0.00%
	Double Click to Generate	No Match Found		0.00%
	Double Click to Generate	True Match	Name matched with sanctioned party	100.00%
	Double Click to Generate	Potential Positive Match		88.40%
	Double Click to Generate	True Match	Name matched with sanctioned party	100.00%
	Double Click to Generate	Potential Positive Match		98.30%
	Double Click to Generate	True Match	Name matched with sanctioned party	100.00%
	Double Click to Generate	Potential Positive Match		81.20%

Alert (J), Matching / Discounting Rationale (K) and Highest Similarity Score (L)

Users should focus on reviewing alerts labelled "True Match" or "Potential Positive Match" first, as they are more likely to point to a sanctioned individual or entity.

> **TIP · Changing an alert**
> After assessing a match and confirming it is not your client, choose “False Positive Match” from the drop-down in the Alert cell.

6.2 Ready-made rationale

The Tool also includes preset narrative as a “Matching / Discounting Rationale” in column K when details like gender, nationality, or date of birth don’t match the candidate from the sanctions list. This helps users quickly decide if a match can be discounted. For example:

- If the input gender is "MALE" and the retrieved gender is "FEMALE," it will show "Gender Mismatch."
- If the input nationality is "UNITED STATES" and the retrieved nationality is "UNITED KINGDOM," it will show "Nationality/ Entity Jurisdiction Mismatch."
- If the input year of birth differs significantly from the retrieved year (e.g., more than ±3 years apart), it will show "Date of Birth (Year) Mismatched."

These notes help you spot false positives fast, making compliance decisions easier and quicker.

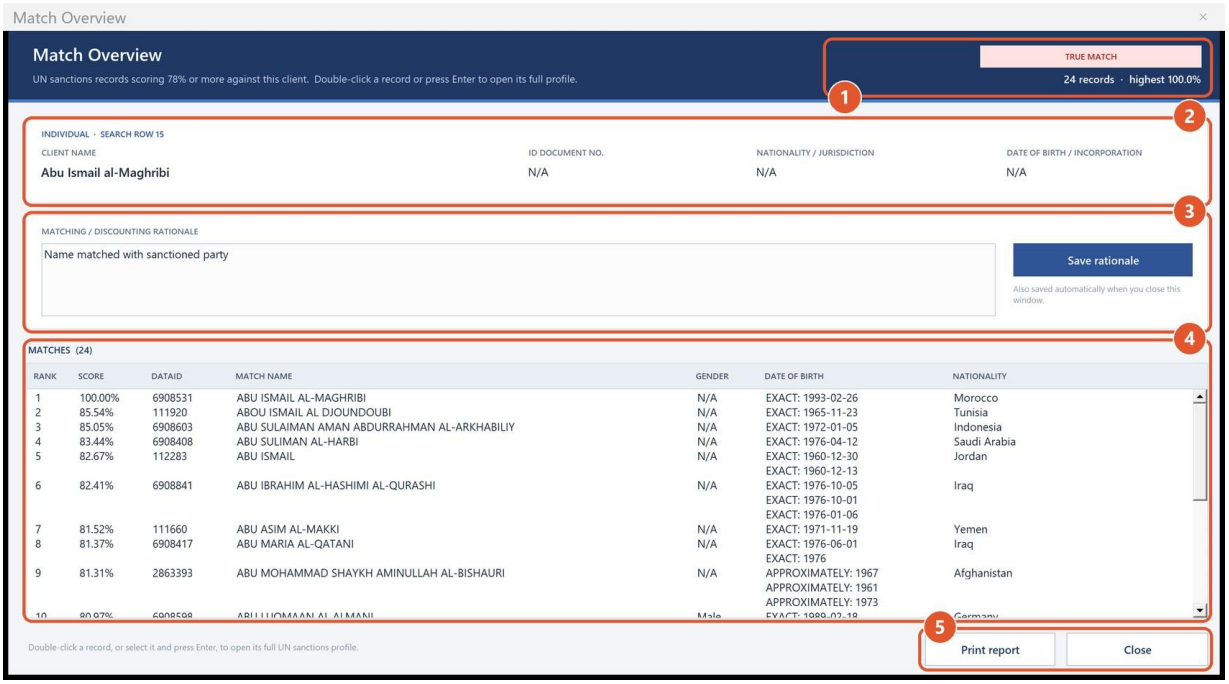
6.3 Opening the matches

Rows with possible matches show the **Highest Similarity Score** in column L. Double-click that cell to open the **Match Overview** for the client (Section 7).

SECTION 7

7 The Match Overview form

The Match Overview lists every UN sanctions record that scores 78% or more against the client, ranked from the highest score down, so you can assess the client in one place.



Match Overview form

1	**Summary**	The client's alert (colour-coded), how many records were found and the highest score.
2	**Client details**	Name, ID document number, nationality or jurisdiction and date of birth or incorporation, as entered on the Search sheet.
3	**Rationale**	Type your matching or discounting rationale and click **Save rationale**. It is written to column K.
4	**Matches**	Rank, score, DataID, name, gender, date(s) of birth and nationality (address for entities). Extra dates of birth and nationalities appear on the lines below each record.
5	**Print report / Close**	Print a branded A4 report (Section 9) or close the form.

7.1 Opening a record

Double-click any record in the list, or select it and press **Enter**, to open its full profile in the Sanctioned Party Details form (Section 8). The overview stays open behind it so you can compare records.

7.2 Recording your rationale

1. Type your findings in the **Matching / Discounting Rationale** box.

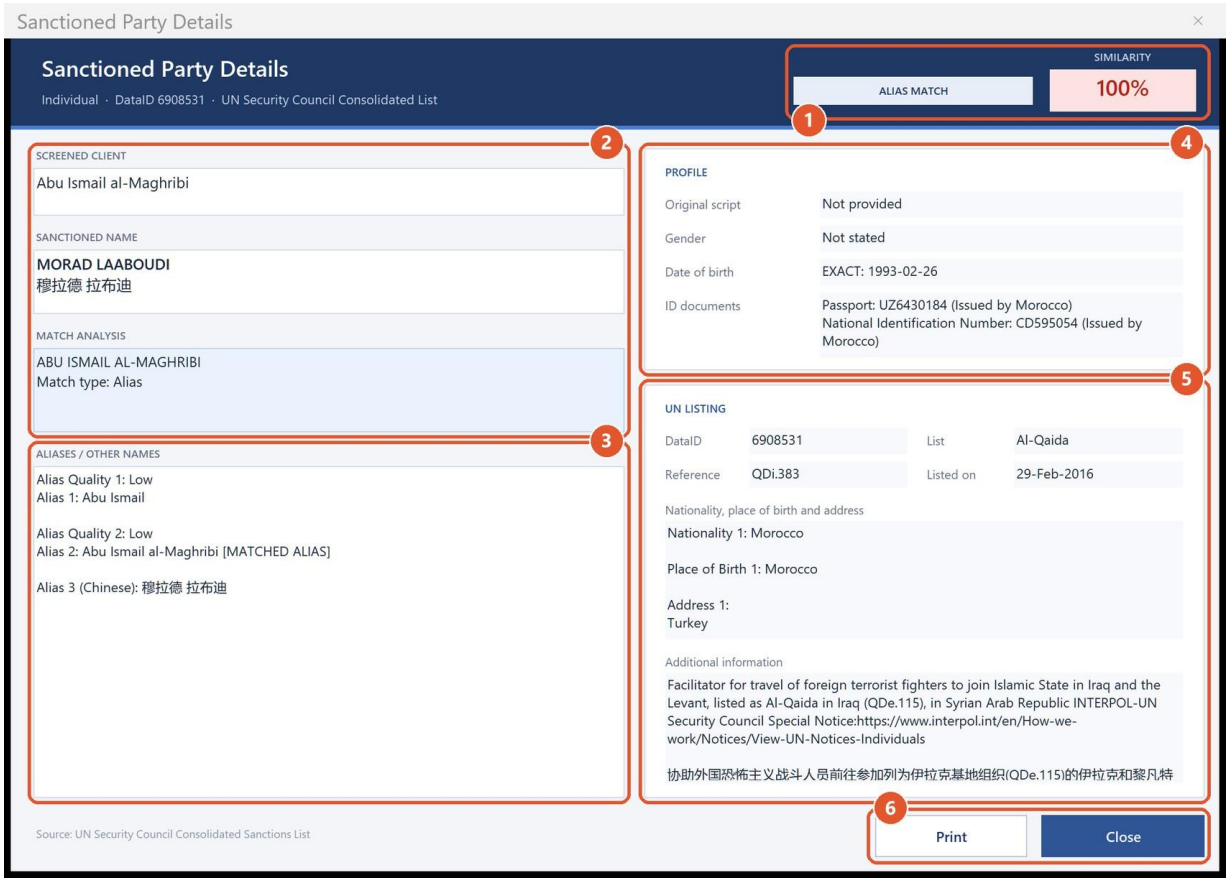
2. Click **Save rationale**. The text is written to column K of the client's row.

> **TIP · Saved automatically**
> If you close the form with **Close** or the window's **X**, any change to the rationale is saved for you. If nothing changed, the workbook is left untouched.

SECTION 8

8 The Sanctioned Party Details form

The details form shows everything the UN list holds about one sanctioned party, so you can decide whether it is your client.



Sanctioned Party Details form

1	**Score and match type**	Similarity score (red from 90%, amber above 50%) and how the name matched: direct, alias or similarity.
2	**Screening result**	The client you screened, the sanctioned party's name (English and Chinese) and the match analysis.
3	**Aliases**	All known aliases with their quality. The alias that matched is marked [MATCHED ALIAS].
4	**Profile**	Name in original script, gender, date of birth and ID documents (passports, national ID numbers).
5	**UN listing**	DataID, UN list, reference number, date listed, nationality, place of birth, addresses and the UN's narrative.
6	**Print / Close**	Print a one-page profile (Section 9) or close the form.

NOTE · Two ways to open it

From the **Match Overview**: double-click a record.

From the **Search sheet**: double-click a Top 1 or Top 2 score or DataID (columns S/T or Z/AA).

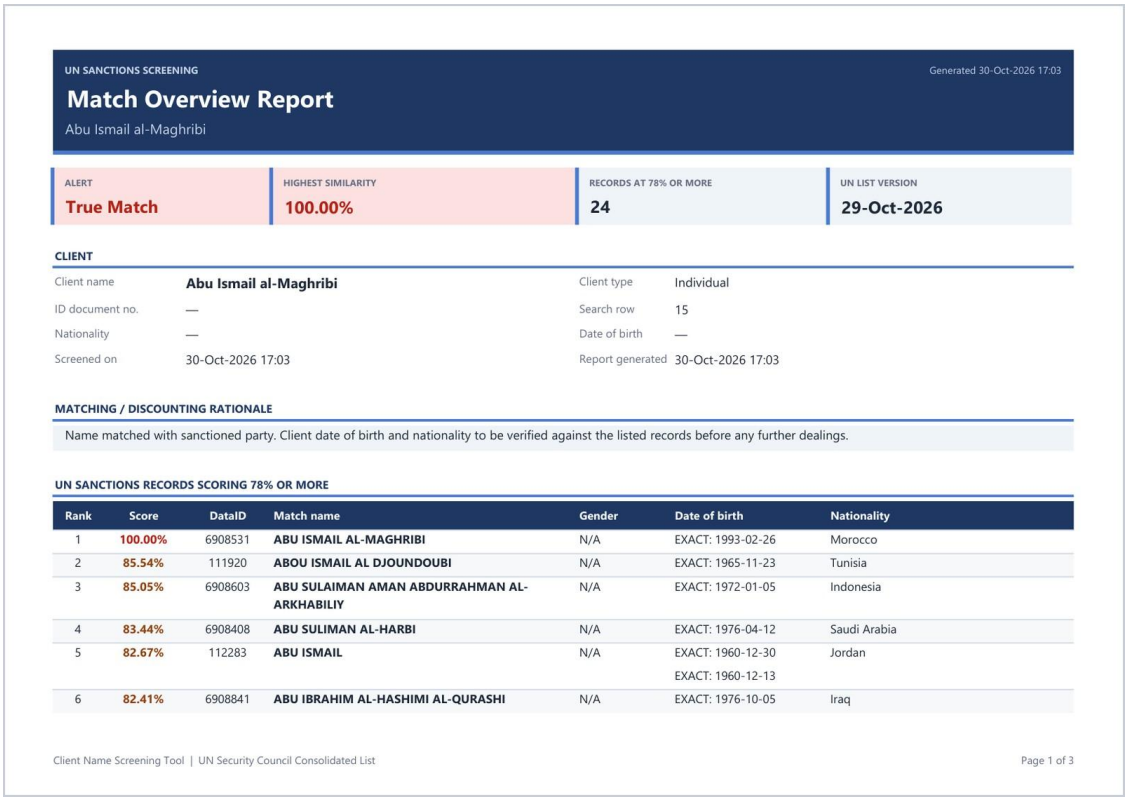
SECTION 9

9 Printing reports

Both forms print a branded A4 report for your client file. Each report fits the page width on any printer, repeats the table headings on every page, numbers the pages and ends with **Reviewed by** and **Approved by** signature lines.

9.1 Match Overview Report

Click **Print report** in the Match Overview. The report shows the alert, highest similarity, number of records and the date of the UN list, followed by the client's details, your rationale and the full list of matches.



UN SANCTIONS SCREENING

Generated 30-Oct-2026 17:03

Match Overview Report

Abu Ismail al-Maghribi

ALERT	HIGHEST SIMILARITY	RECORDS AT 78% OR MORE	UN LIST VERSION
True Match	100.00%	24	29-Oct-2026

CLIENT

Client name	Abu Ismail al-Maghribi	Client type	Individual
ID document no.	—	Search row	15
Nationality	—	Date of birth	—
Screened on	30-Oct-2026 17:03	Report generated	30-Oct-2026 17:03

MATCHING / DISCOUNTING RATIONALE

Name matched with sanctioned party. Client date of birth and nationality to be verified against the listed records before any further dealings.

UN SANCTIONS RECORDS SCORING 78% OR MORE

Rank	Score	DataID	Match name	Gender	Date of birth	Nationality
1	100.00%	6908531	ABU ISMAIL AL-MAGHRIBI	N/A	EXACT: 1993-02-26	Morocco
2	85.54%	111920	ABOU ISMAIL AL DJOUNDOUBI	N/A	EXACT: 1965-11-23	Tunisia
3	85.05%	6908603	ABU SULAIMAN AMAN ABDURRAHMAN AL-ARKHABILIY	N/A	EXACT: 1972-01-05	Indonesia
4	83.44%	6908408	ABU SULIMAN AL-HARBI	N/A	EXACT: 1976-04-12	Saudi Arabia
5	82.67%	112283	ABU ISMAIL	N/A	EXACT: 1960-12-30 EXACT: 1960-12-13	Jordan
6	82.41%	6908841	ABU IBRAHIM AL-HASHIMI AL-QURASHI	N/A	EXACT: 1976-10-05	Iraq

Client Name Screening Tool | UN Security Council Consolidated List

Page 1 of 3

Match Overview Report, page 1 (the matches table continues on the next pages)

9.2 Sanctioned Party Profile

Click **Print** in the Sanctioned Party Details form for a profile of the selected record: score, match type, UN list and listing date, the screening result, the party's identifiers, addresses, aliases (matched alias highlighted) and the UN's additional information.



UN SANCTIONS SCREENING

Generated 30-Oct-2026 16:53

Sanctioned Party Profile

YUK TUNG ENERGY PTE LTD

SIMILARITY	MATCH TYPE	UN LIST	LISTED ON
86.7%	Similarity Match	DPRK	30-Mar-2018

SCREENING RESULT

Screened client	Yat Tung Energy Limited
Match analysis	YUK TUNG ENERGY PTE LTD Match type: Similarity Match

SANCTIONED PARTY

Name	YUK TUNG ENERGY PTE LTD		
Original script	Not provided		
Gender	—	Date of birth	—
DataID	6908689	Reference	KPe.075
ID documents	No documentation found.		

NATIONALITY, PLACE OF BIRTH AND ADDRESS

Entity Address 1:

80 Raffles Place, #17-22 UOB Plaza, Singapore, 048624, Singapore

ALIASES / OTHER NAMES

Alias 1 (Chinese): YUK TUNG ENERGY PTE LTD

ADDITIONAL INFORMATION

Ship manager and commercial manager of the YUK TUNG, which conducted ship-to-ship transfer of refined petroleum product. IMO number: 5987860.

"YUK TUNG"号船舶经营人和商业经营人，该船进行了精炼石油产品船到船转移。海事组织编号：5987860。

REVIEW AND SIGN-OFF

Reviewed by	_____	Date	_____
Approved by	_____	Date	_____

Client Name Screening Tool | UN Security Council Consolidated List

Page 1 of 1

Sanctioned Party Profile

9.3 Print or save as PDF

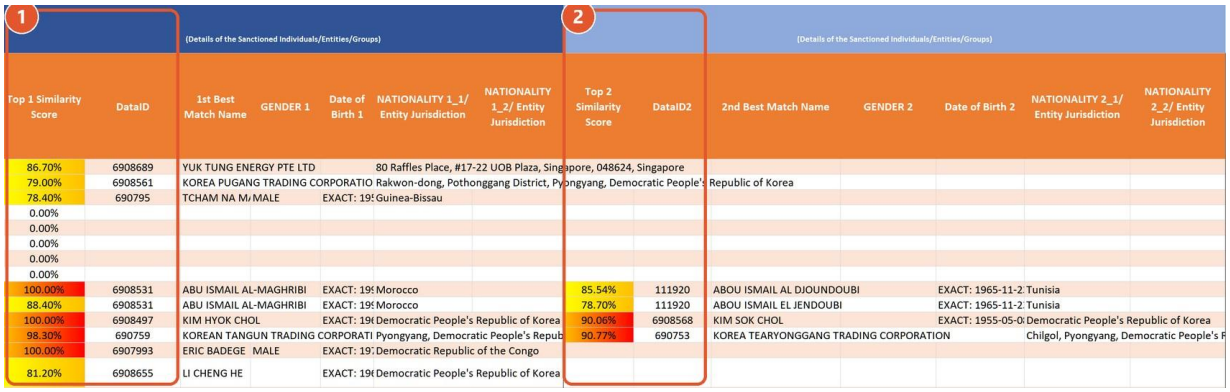
1. Click **Print report** or **Print**. Excel opens its Print Preview.
2. Click **Print** and choose your printer, or choose **Microsoft Print to PDF** to save a digital copy for the client file.
3. To leave without printing, click **Close Print Preview**. The form reappears where you left it.

> **NOTE · On a Mac**
>
> The report is saved as a PDF instead: choose where to save it and it opens automatically.

SECTION 10

10 The Top 2 Result Panel

After screening, columns S to AH show the two best matches for each client next to the inputs, so you can scan the results without leaving the sheet.



1		(Details of the Sanctioned Individuals/Entities/Groups)					2		(Details of the Sanctioned Individuals/Entities/Groups)				
Top 1 Similarity Score	DataID	1st Best Match Name	GENDER 1	Date of Birth 1	NATIONALITY 1_1/ Entity Jurisdiction	NATIONALITY 1_2/ Entity Jurisdiction	Top 2 Similarity Score	DataID2	2nd Best Match Name	GENDER 2	Date of Birth 2	NATIONALITY 2_1/ Entity Jurisdiction	NATIONALITY 2_2/ Entity Jurisdiction
86.70%	6908689	YUK TUNG ENERGY PTE LTD			80 Raffles Place, #17-22 UOB Plaza, Singapore, 048624, Singapore								
79.00%	6908561	KOREA PUGANG TRADING CORPORATIO			Rakwon-dong, Pothonggang District, Pyongyang, Democratic People's Republic of Korea								
78.40%	690795	TCHAM NA MA	MALE	EXACT: 19	Guinea-Bissau								
0.00%													
0.00%													
0.00%													
0.00%													
0.00%													
100.00%	6908531	ABU ISMAIL AL-MAGHRIBI		EXACT: 19	Morocco		85.54%	111920	ABOU ISMAIL AL DJOUNDOUBI		EXACT: 1965-11-2	Tunisia	
88.40%	6908531	ABU ISMAIL AL-MAGHRIBI		EXACT: 19	Morocco		78.70%	111920	ABOU ISMAIL EL JENDOUBI		EXACT: 1965-11-2	Tunisia	
100.00%	6908497	KIM HYOK CHOL		EXACT: 19	Democratic People's Republic of Korea		90.06%	6908568	KIM SOK CHOL		EXACT: 1955-05-0	Democratic People's Republic of Korea	
98.30%	690759	KOREAN TANGUN TRADING CORPORATI			Pyongyang, Democratic People's Repub		90.77%	690753	KOREA TEARYONGGANG TRADING CORPORATION			Chilgol, Pyongyang, Democratic People's F	
100.00%	6907993	ERIC BADEGE	MALE	EXACT: 19	Democratic Republic of the Congo								
81.20%	6908655	LI CHENG HE		EXACT: 19	Democratic People's Republic of Korea								

Top 2 Result Panel

1	**1st best match**	Similarity score in column **S**, DataID in column **T**, followed by name, gender, date of birth and nationality.
2	**2nd best match**	Similarity score in column **Z**, DataID in column **AA**, followed by the same details.

Opening a profile from the panel

1. Find the score or DataID in columns S/T (first match) or Z/AA (second match).
2. Double-click the cell.
3. The Sanctioned Party Details form opens with the full UN record.

User Action: Use this information to determine whether the match is a true positive (the client is the sanctioned party) or a false positive (similar name but different individual/entity). Document your assessment in the client matter file.

WORKED EXAMPLE

11 Case study: step by step

This example follows a corporate client through the whole workflow: entering the parties, screening, reviewing a potential match, recording the rationale and keeping the records.

11.1 The client

Corporate client 1

Yat Tung Energy Limited
Incorporated in Hong Kong on 01/08/2023

Corporate client 2

Pan Pacific Trading Limited
Incorporated in Hong Kong on 01/08/2023
Global shipping, recently trading coal and fuel in Asia-Pacific; retained for a new subsidiary and a letter of credit. Vessels: IMO 9630444, 5571322, 9894973.

Directors

Janis Tin Tan Cheung – female, born 13 Jun 1988, Hong Kong
Sally Anna Jolie – female, born 13 Jun 1977, Argentine

Beneficial owner

Tai Man Chan (also known as Simon Chan) – male, born 13 Jun 1988, Hong Kong

11.2 Enter the names

Individual/ Entity names should be input in separate rows to make sure the Tool will run properly. Do not combine multiple names in a single row or use merged cells, as this may cause errors or incomplete screening results.

5	Database: United Nations Security Council Consolidated List						
6	Client Full Name	Chinese Name	ID Document Number	Gender	Nationality/ Place of Incorporation/ Entity Jurisdiction	Date of Birth/ Date of Incorporation (dd-mm-yyyy)	Entity Name (English/Chinese)
7					Hong Kong	1/8/2023	Yat Tung Energy Limited
8					Hong Kong	1/8/2023	Pan Pacific Trading Limited
9	Tai Man Chan			Male	Hong Kong	13/6/1988	
10	Simon Chan			Male	Hong Kong	14/6/1988	
11	Janis Tin Tan Cheung			Female	Hong Kong	13/6/1988	
12	Sally Anna Jolie			Female	Argentine	13/6/1977	
13	Janis Cheung			Female	Hong Kong	13/6/1988	
14	Tin Tan Cheung			Male	Hong Kong	13/6/1988	
15	Abu Ismail al-Maghribi						
16	el-Maghribi Bbu Ismail						
17	Kim Hyok Chol						
18							Korea Tangun Trading Corporation
19	ERIC BADEGE	埃里克巴德热					
20	lam cheng						

Each entity, director and beneficial owner in its own row

11.3 Screen and review

1. Click **Start Screening**.
2. The Tool screens every row against the latest UN list.
3. Results appear in the Alert, Highest Similarity Score and Top 2 columns.

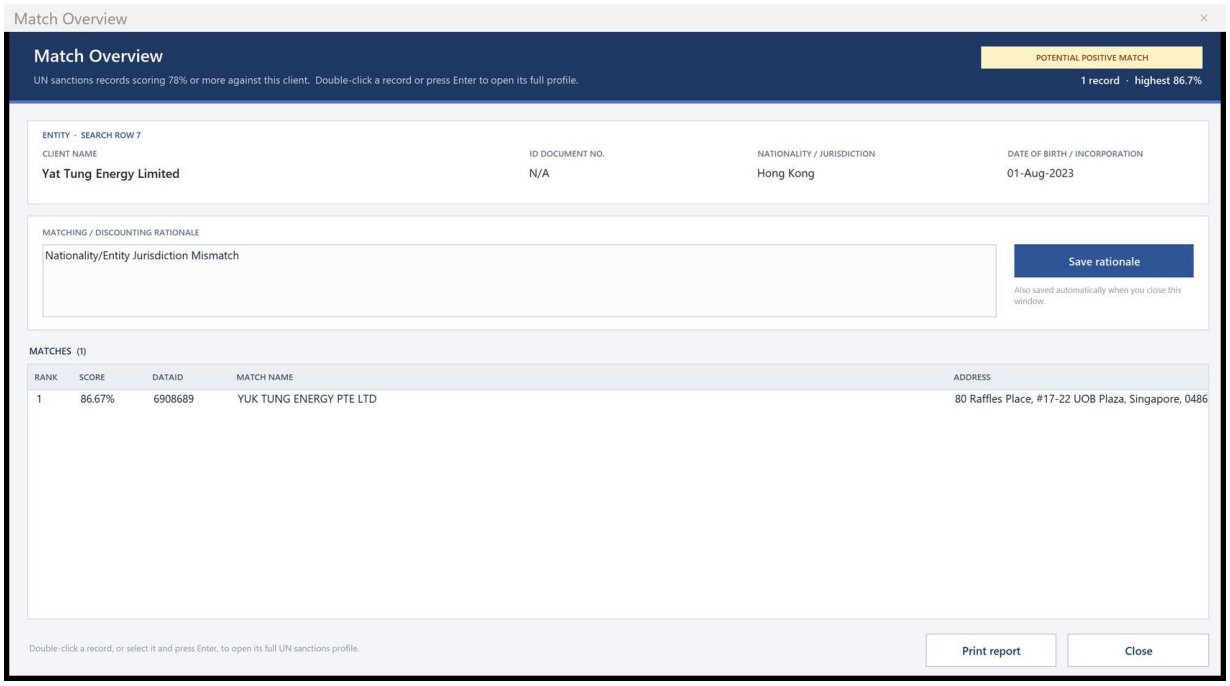
Yat Tung Energy Limited is flagged as a **Potential Positive Match** with a Highest Similarity Score of **86.70%** in column L.

Entity Name (English/Chinese)	Additional Information for AI Report	AI Due Diligence Report	Alert	Matching / Discounting Rationale	Highest Similarity Score
Yat Tung Energy Limited		**Double Click to Generate**	Potential Positive Match	Nationality/Entity Jurisdiction Mismatch	86.70%
Pan Pacific Trading Limited		**Double Click to Generate**	False Positive Match	Partial Name Matched; Nationality/Entity	79.00%

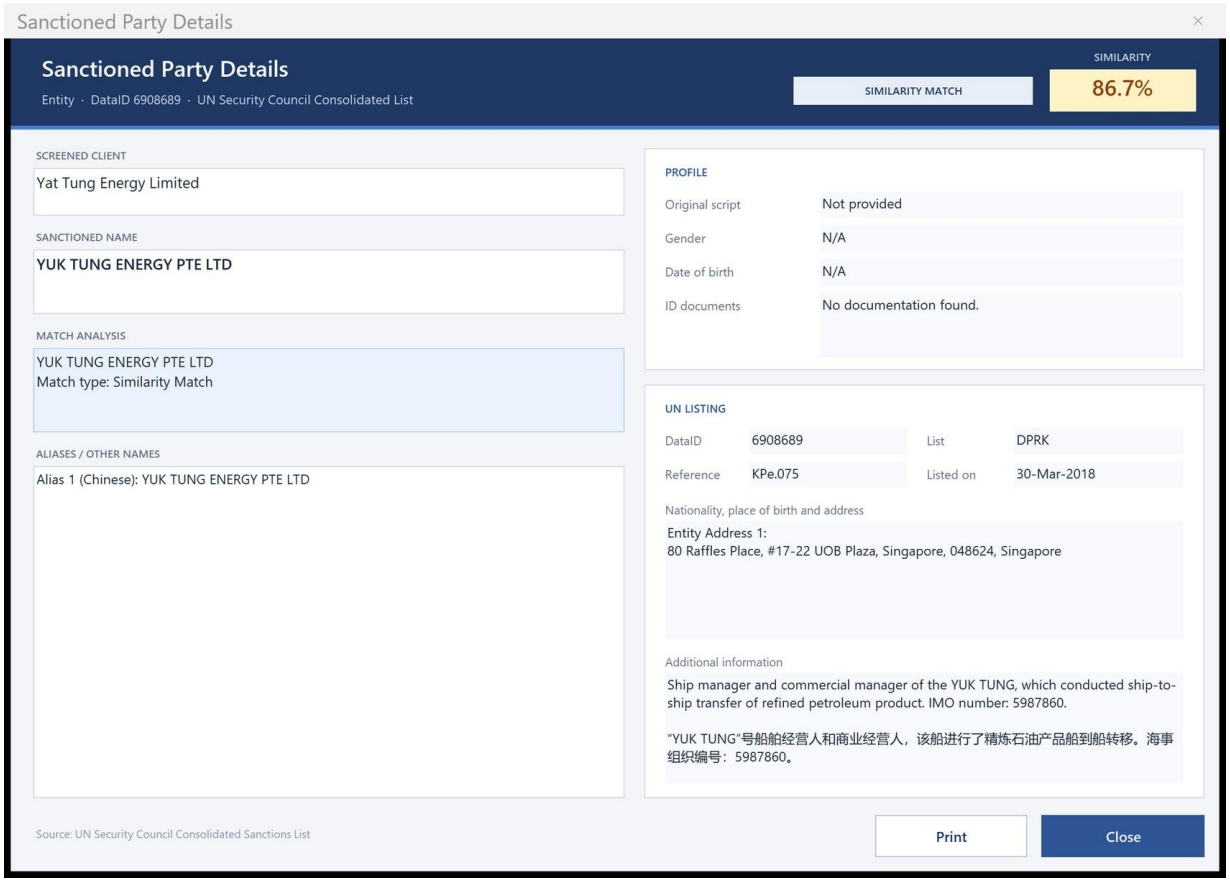
Double-click the score in column L

Step 1 – Open the details

Double-click the score **86.70%**. The Match Overview lists the one record above 78%: **YUK TUNG ENERGY PTE LTD**. Double-click it to open the full profile.



Match Overview for Yat Tung Energy Limited



Profile of Yuk Tung Energy Pte Ltd

Step 2 – Assess the match

After reviewing the detailed form and comparing it with the client's information, we can discount this "Potential Positive Match" as a "False Positive Match" for the following reasons:

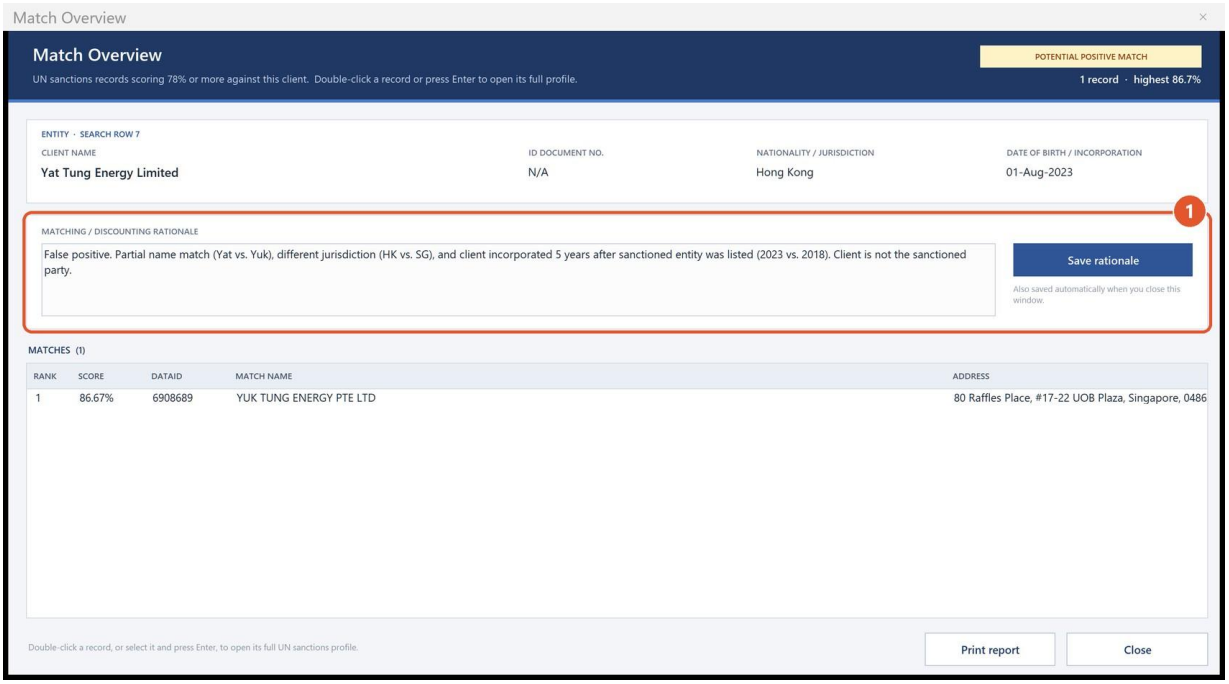
Finding	Client	Sanctioned entity	Why it matters
Partial name match	Yat Tung Energy Limited	Yuk Tung Energy PTE LTD	The core names differ (Yat vs. Yuk). Suffixes such as Limited, LTD and PTE do not change the assessment.
Different jurisdiction	Incorporated and operating in Hong Kong	Operating in Singapore (address on the UN list)	Different jurisdictions and bases suggest separate entities.
Timeline	Incorporated 1 August 2023	Listed 30 March 2018	The client was incorporated five years after the entity was designated.

> **NOTE · Conclusion**
>
> This is a **false positive**: the client is not the sanctioned party.

11.4 Record the rationale

It is strongly recommended that users document their assessment and rationale in the "Matching / Discounting Rationale" field of the Match Overview Form or directly in Column K.

Example entry: “False positive. Partial name match (Yat vs. Yuk), different jurisdiction (HK vs. SG), and client incorporated 5 years after sanctioned entity was listed (2023 vs. 2018). Client is not the sanctioned party.”



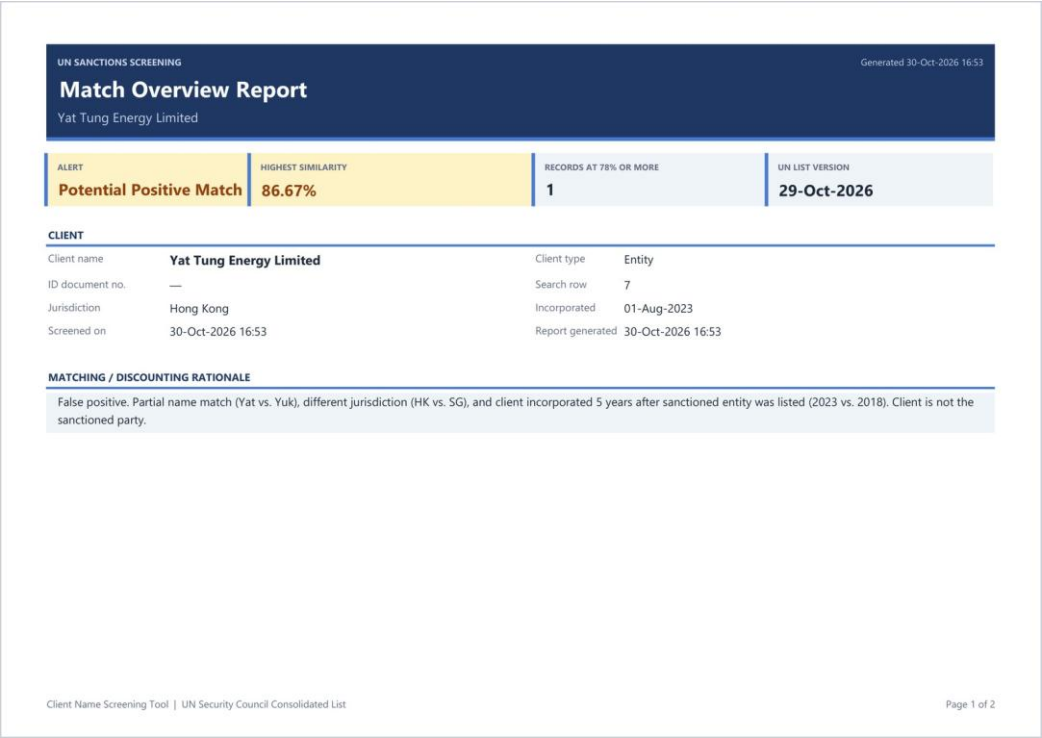
Type the rationale in the Match Overview and click Save rationale

The rationale is written to column K; change the alert in column J to “False Positive Match”.

Entity Name (English/Chinese)	Additional Information for AI Report	AI Due Diligence Report	Alert	Matching / Discounting Rationale	Highest Similarity Score
Yat Tung Energy Limited		**Double Click to Generate**	False Positive Match	False positive. Partial name match (Yat vs	86.70%
Pan Pacific Trading Limited		**Double Click to Generate**	False Positive Match	Partial Name Matched; Nationality/Entity	79.00%

Column K updated with the rationale

Print the **Match Overview Report** for the client file if your firm keeps paper or PDF records.



UN SANCTIONS SCREENING

Generated 30-Oct-2026 16:53

Match Overview Report

Yat Tung Energy Limited

ALERT	HIGHEST SIMILARITY	RECORDS AT 78% OR MORE	UN LIST VERSION
Potential Positive Match	86.67%	1	29-Oct-2026

CLIENT

Client name	Yat Tung Energy Limited	Client type	Entity
ID document no.	—	Search row	7
Jurisdiction	Hong Kong	Incorporated	01-Aug-2023
Screened on	30-Oct-2026 16:53	Report generated	30-Oct-2026 16:53

MATCHING / DISCOUNTING RATIONALE

False positive. Partial name match (Yat vs. Yuk), different jurisdiction (HK vs. SG), and client incorporated 5 years after sanctioned entity was listed (2023 vs. 2018). Client is not the sanctioned party.

Client Name Screening Tool | UN Security Council Consolidated List

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Match Overview Report for Yat Tung Energy Limited

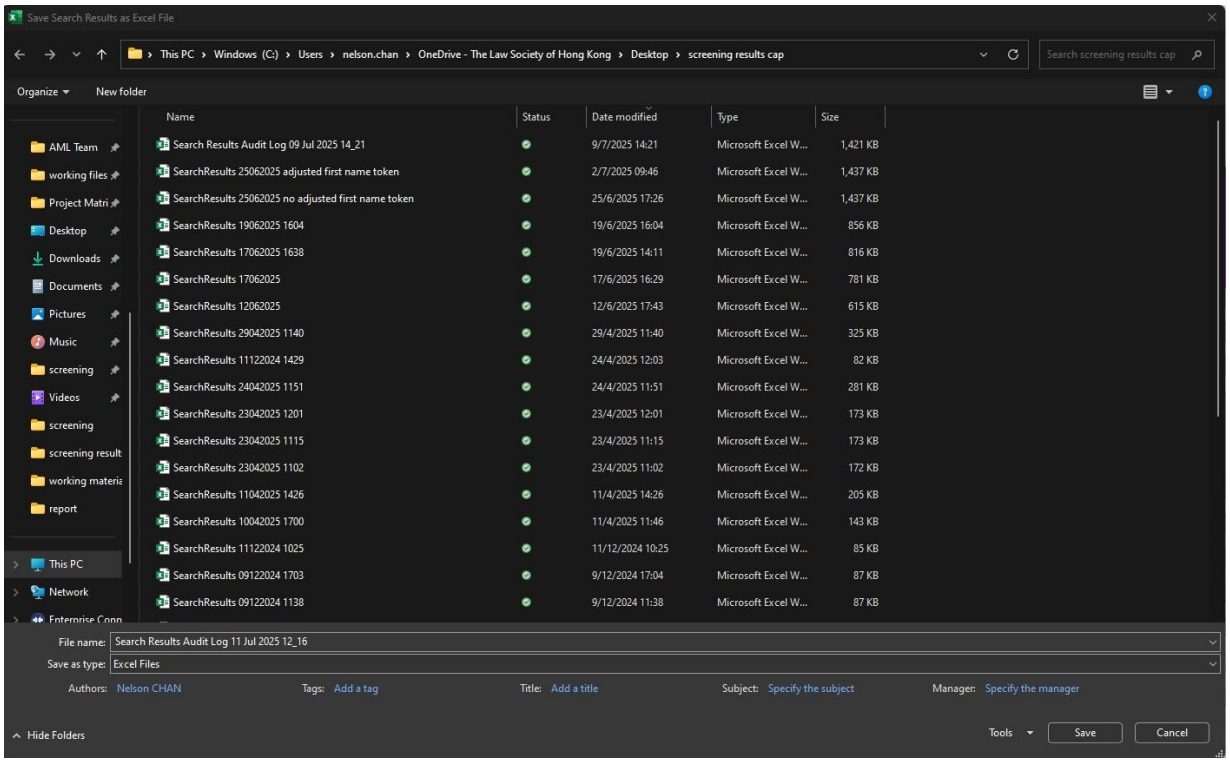
11.5 Export for record keeping

Once you have completed the assessment of all "True Matches" and "Potential Positive Matches", you must export the results for compliance and audit purposes.

1. Click **Export Results for Record Keeping**.
2. A new Excel file is created as an audit log with all screening results, similarity scores, match details and your documented assessments.
3. In the **Save As** window, the name is preset as “Search Results Audit Log DD MM YYYY HH_MM”; change it to suit your firm’s naming standards if you wish.
4. Save the file to the client matter file or a dedicated AML compliance folder.



Export Results for Record Keeping



Save the audit log

> **TIP · Compliance tip**
> Always retain these audit logs in the client matter file. They provide evidence of your sanctions screening compliance and can be produced during regulatory inspections or internal audits.

11.6 Summary

1. Enter names in separate rows in the input panel.
2. Click **Start Screening**.
3. Review results in the Match Overview or the Top 2 Result Panel, starting with flagged alerts.
4. Double-click matches to open their full profiles.
5. Assess the match and record your rationale (Match Overview or column K).
6. Print the reports you need and export the results for record keeping.

SECTION 12

12 AI Due Diligence Report

12.1 Disclaimer and purpose of use

1. Purpose and Utility

The Due Diligence Report is designed to streamline client risk assessment, particularly for member firms with limited resources or specialized AML/CTF/CPF experience. By automating searches of publicly available information—covering sanctions, PEP status, adverse media, and terrorist financing/proliferation financing analysis—the Tool provides an efficient starting point for due diligence obligations under the Anti-Money Laundering and Counter-Terrorist Financing Ordinance (AMLO, Cap. 615), United Nations Sanctions Ordinance (UNSO, Cap. 537), United Nations (Anti-Terrorism Measures) Ordinance (UNATMO, Cap. 575), and Practice Direction P.

1A. The Law Society's Position and User Responsibilities

As the regulatory body for the legal profession in Hong Kong, the Law Society recognizes the practical challenges that solicitors' firms face in complying with increasingly complex AML/CTF/CPF obligations, particularly regarding sanctions screening, PEP identification, and adverse media searches. This Tool has been developed out of goodwill to support the profession, especially small and medium-sized firms that may have limited resources or in-house expertise in these specialized areas.

Use of this Tool is entirely voluntary. Firms are free to choose whether to adopt it based on their own operational needs, risk appetite, and privacy considerations. However, all solicitors must understand that regardless of whether they use this Tool or not, they remain fully responsible for establishing and maintaining robust client due diligence (CDD) measures as required under the AMLO, UNSO, UNATMO, Legal Practitioners Ordinance (LPO), and related Practice Directions. The AI-generated due diligence report and screening functions provided by this Tool are only **one component** of a comprehensive CDD workflow; they do not constitute the entirety of your obligations.

Firms that choose not to use this Tool must implement their own alternative solutions to demonstrate compliance with sanctions screening, PEP checks, and adverse media monitoring requirements. Simply opting out of this Tool does not exempt a firm from these regulatory obligations. The Law Society expects all practitioners to exercise their professional judgment and legal expertise in designing and implementing CDD processes that are appropriate to their practice. As legal professionals, solicitors are expected to conduct their own analysis of the legal and regulatory framework applicable to their AML compliance arrangements. This disclaimer provides information to assist your decision-making but does not substitute for independent professional assessment of your firm's specific obligations and risk profile.

2. Scope and Limitations

2.1 Not a Complete Risk Assessment

While this Report provides a comprehensive overview of publicly available data, it does not constitute a complete analysis of a client's overall ML/TF/PF risk. Users must still consider other critical risk factors (e.g., nature of business, source of funds, transaction patterns, face-to-face interactions) that are outside the scope of public internet searches.

2.2 Supplementary Tool Only

The Report is a tool to assist, not replace, professional judgment or your firm's full client due diligence process. Users must exercise independent professional discretion when interpreting results and making compliance decisions.

2.3 AI-Generated Content Limitations

This Tool incorporates AI features powered by large language models. AI outputs are supportive aids only and may contain inaccuracies, omissions, or hallucinations inherent to such models. Always conduct independent verification by reviewing the primary sources documented in Section I: Source Appendix (including URLs and access dates) of the Due Diligence Report. Document all verification steps in your firm's compliance records.

3. Data Protection and Privacy Compliance

3.1 Overview: Your Responsibilities Under PDPO

Use of the AI function involves transmitting personal data to external AI platforms (Grok, Google Gemini, Perplexity, Microsoft Copilot) that process data on infrastructure located outside Hong Kong. This engages obligations under the **Personal Data (Privacy) Ordinance (Cap. 486)**, including:

- **Data Protection Principle 1 (DPP1)**: Fair collection and notification
- **Data Protection Principle 3 (DPP3)**: Purpose limitation and use
- **Data Protection Principle 4 (DPP4)**: Data security
- Cross-border data transfer considerations

Your firm remains the "data user" under PDPO and is solely responsible for compliance with all data protection requirements, regardless of the platforms used.

3.2 Mandatory: Client Notification (PICS)

Before using this Tool, you must provide clients with a comprehensive **Personal Information Collection Statement (PICS)** in accordance with DPP1 of the PDPO. The PICS must explicitly disclose:

- Use of AI platforms for AML screening purposes
- Transmission of personal data to third-party AI providers
- Cross-border processing (data processed outside Hong Kong)
- Client rights under PDPO (access, correction)

Sample PICS Wording

"Your personal data will be collected and processed for anti-money laundering, counter-terrorist financing, and sanctions screening purposes as required under Hong Kong law (AMLO, UNSO, UNATMO). To conduct accurate screening and reduce false positive matches, we may submit limited identifiers (name, date of birth, gender, nationality) to third-party AI platforms (Grok, Google Gemini, Perplexity, and/or Microsoft Copilot) that process data outside Hong Kong.

These minimal identifiers are necessary to distinguish you from individuals with similar names on sanctions and PEP lists and to comply with our regulatory obligations. Queries are transmitted via encrypted connections. AI platforms are configured with training opt-outs to prevent use of your data for model training purposes, though data may be retained temporarily by providers (typically 30 days to 6 months) for service delivery.

You have rights to access and correct your data under the Personal Data (Privacy) Ordinance. For enquiries, contact [your firm's privacy officer/DPO contact]."

Firms should tailor this wording to their specific engagement letters or CDD intake forms.

3.2A. Use of AI vs Ordinary Internet Search

When this Tool uses AI services to search for sanctions, PEP, or adverse media information, the process is similar to using an ordinary internet search engine such as Google. The client's name and limited identifiers are sent to external servers, which may be located outside Hong Kong, and may be logged or retained for a period of time for service operation and security purposes.

To enhance protection beyond normal search use, we restrict inputs to essential identifiers only (name, date of birth, gender and, where relevant, nationality) and avoid sending identification numbers, addresses or detailed case information. Where the AI service allows, we also configure settings to opt out of using client data for model training and to limit retention periods, so that only the minimum necessary data is processed to support AML/CTF/CPF screening.

3.3 Data Minimization: Essential Identifiers Only

To comply with PDPO data minimization principles while ensuring effective AML screening:

✓ Include (Essential)

- Full name (including known aliases)
- Date of birth
- Gender

✓ Include if Available and Relevant

- Nationality
- Country of residence

✗ Never Include

- HKID numbers or passport numbers
- Full residential addresses
- Financial account details
- Confidential legal matter details

This approach provides data genuinely necessary for accurate sanctions and PEP screening under FATF standards while minimizing privacy risks.

3.4 AI Platform Privacy Configuration

Firms must maintain proper privacy configurations on all AI platforms:

Required Actions

- **Enable training opt-outs** on:
  - Grok (via profile icon → Settings at grok.com)
  - Perplexity (via profile icon → Settings → AI Data Retention toggle)
  - Microsoft Copilot (via Settings → Privacy → Model Training)

  - Google Gemini (via Gemini Apps Activity → Turn off)
- **Document configurations** with dated screenshots for audit purposes
- **Conduct quarterly reviews** to ensure settings remain active (providers may update policies or reset preferences)

Refer to Section 12.3 of this Guide for detailed step-by-step instructions.

3.5 Cross-Border Data Transfer and PDPO Exemptions

The Issue

AI platforms process data on servers outside Hong Kong, constituting cross-border transfers under Section 33 of the PDPO. The Privacy Commissioner expects data users to ensure adequate protections when data is processed outside Hong Kong.

Potential Legal Bases for Processing

Your use of this Tool for AML/CTF purposes may fall within statutory exemptions under Part VIII of the PDPO, particularly:

Section 58 (Crime Prevention)

Processing personal data for preventing or detecting money laundering, terrorist financing, or sanctions evasion—all criminal offences under Hong Kong law—may qualify as crime prevention justifying the use and cross-border transfer.

Section 60B (Legal Proceedings / Legal Rights)

Processing may be necessary for:

- Compliance with legal obligations (UNSO, UNATMO, AMLO, Practice Direction P)
- Establishing, exercising, or defending legal rights (including deciding whether to accept/continue a retainer)

Important Limitations

- These exemptions are defences, not automatic permissions
- **You bear the burden of proof** to demonstrate an exemption applies to your specific circumstances
- Exemptions should not be relied upon routinely; assess case-by-case
- **Document your compliance rationale** in your firm's AML records

3.6 Risk-Mitigating Strategies

To minimize data protection risks while maintaining AML effectiveness:

✓ **Use pseudonymized data for exploratory queries** where practical (e.g., "Client A, Chinese national, born 1980s") before inputting full identifiers

✓ **Two-stage screening**: Use AI for preliminary risk assessment with minimal identifiers; conduct detailed verification using local Hong Kong resources.

✓ **Consider client consent** where exemptions may not clearly apply or for particularly sensitive matters

✓ **For particularly high-risk or sensitive matters** (e.g., high-value transactions, high-profile clients, or matters involving heightened confidentiality concerns), consider whether manual screening using subscription databases or local Hong Kong resources may be more appropriate than AI-assisted searches.

3.7 Restricted Use: AML/CTF Purposes Only

The AI function must be used strictly for AML/CTF/CPF compliance purposes, including:

- Initial sanctions screening during client intake
- Periodic client reviews
- Enhanced due diligence for high-risk clients
- Suspicious transaction analysis supporting STR/SAR reporting

Any deviation—including use for general legal research, marketing, business development, or non-regulatory activities—may violate DPP3 (purpose limitation) and expose your firm to regulatory liability.

4. Data Accuracy and Liability

4.1 Current as of Generation Date

The Report is compiled from publicly available information using AI-driven search tools and is current only as of the date of generation. Report accuracy depends on:

- Availability and quality of online public data
- Accuracy of user-provided input data
- AI platform search effectiveness

There is no guarantee the AI will retrieve all relevant information available on the internet.

4.2 Verification Required

Users must independently verify all findings—including sanctions matches, PEP identifications, and adverse media—before making compliance decisions. Cross-check cited sources in Section I: Source Appendix by:

- Clicking through to original URLs
- Confirming information accuracy
- Checking for updated information

4.3 No Legal Advice

This Report does not constitute legal advice. Findings are not guaranteed to be complete, accurate, or up-to-date beyond the data available at the time of generation.

4.4 Limitation of Liability

The Law Society of Hong Kong provides this Tool on an "as-is" basis without warranties of any kind, including accuracy, completeness, or fitness for AML/CTF purposes. The Law Society is not liable for any actions taken, decisions made, or consequences arising from reliance on this Report. Users assume all risk and full liability for PDPO compliance, data security, and any consequences arising from use of the Tool and Report.

4.5 Recordkeeping

Retain all Reports and source documentation for regulatory audits in accordance with AMLO recordkeeping requirements (minimum 5 years).

5. Professional Responsibility

Each firm and practitioner remains solely responsible for

- Compliance with PDPO, AMLO, UNSO, UNATMO, and Practice Direction P
- Client confidentiality and legal professional privilege
- Professional conduct obligations under the Law Society's rules and guidelines
- Exercising independent professional judgment in all compliance decisions

The Law Society does not provide legal advice on data protection or AML compliance for individual matters. Firms should seek independent legal advice where necessary.

For data protection guidance, consult the Privacy Commissioner for Personal Data (PCPD) resources on AI in regulated sectors: www.pcpd.org.hk

Compliance with the Personal Data (Privacy) Ordinance (PDPO, Cap. 486) and relevant regulatory requirements remains the sole responsibility of the individual firm or practitioner. For further guidance, consult a qualified data protection specialist or refer to PCPD resources on AI in regulated sectors.

12.2 Overview

The AI-Gen Due Diligence Report feature of the Client Name Screening Tool in Column I of the Search tab assists legal professionals in meeting Anti-Money Laundering/ Counter Terrorist Financing/ Counter Proliferation Financing (“AML/CTF/CPF”) compliance obligations. By automating searches for sanctions, politically exposed persons (PEPs), and adverse media, the Tool generates a comprehensive, regulator-ready report in user-friendly format, ensuring thorough documentation for compliance purposes.

To maximize the Tool’s capabilities, we recommend registering for a free account on your preferred platform (e.g., grok.com, gemini.google.com, copilot.microsoft.com or perplexity.ai). Registered accounts typically offer improved access to advanced AI models and deeper search functionalities. Please be aware that while these services are free, they are subject to daily usage limits.

While the Tool supports multiple platforms, our internal testing indicates that Grok delivers the most consistent and comprehensive analysis for due diligence purposes with the use of “Expert” model. Therefore, we recommend prioritising Grok when available.

12.3 Turning off AI training for better data protection

By default, most consumer AI platforms (Grok, Google Gemini, Perplexity, Microsoft Copilot) use your conversation data to train and improve their models. When conducting client due diligence, **you must disable this training function** to protect client confidentiality and comply with professional obligations under the Personal Data (Privacy) Ordinance (Cap. 486) and Practice Direction P.

Training Policy Summary

Platform	Default Behavior	Can Disable Training?
Grok (grok.com)	Trains on data by default	✓ Yes - toggle off in Settings
Perplexity (Free/Pro)	Trains on data by default	✓ Yes - toggle off in Preferences

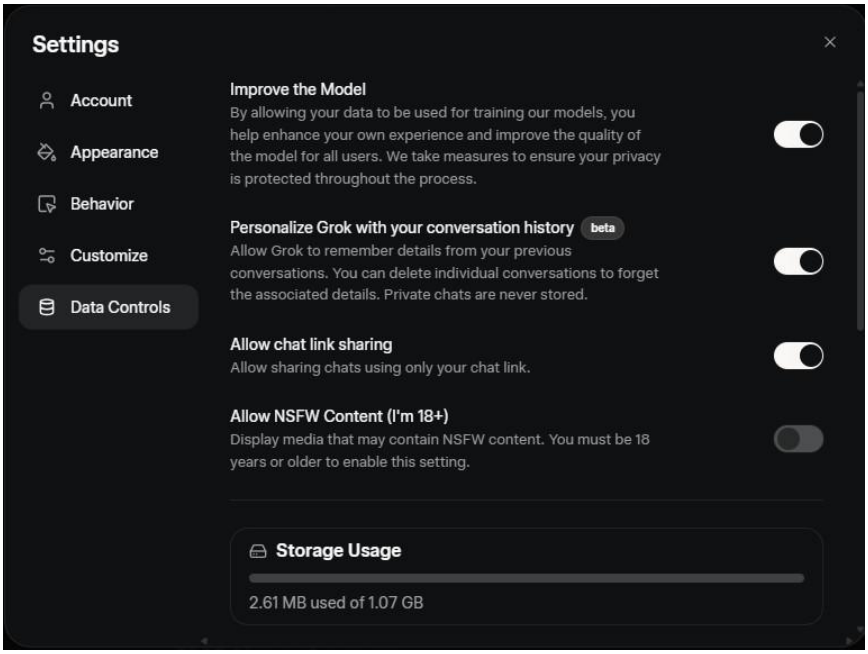
Platform	Default Behavior	Can Disable Training?
Microsoft Copilot (Consumer)	May train on interaction data	✓ Yes - opt out in Privacy settings
Google Gemini	Trains on data by default	✓ Yes - toggle off in Settings

Step-by-Step Instructions

Option 1: Grok (grok.com)

- Go to grok.com and log in
- Click your profile icon (top right corner)
- Select Settings
- Find “Data Control” and "Improve the Model"
- **Toggle OFF** this option
- Confirm changes

Screenshot

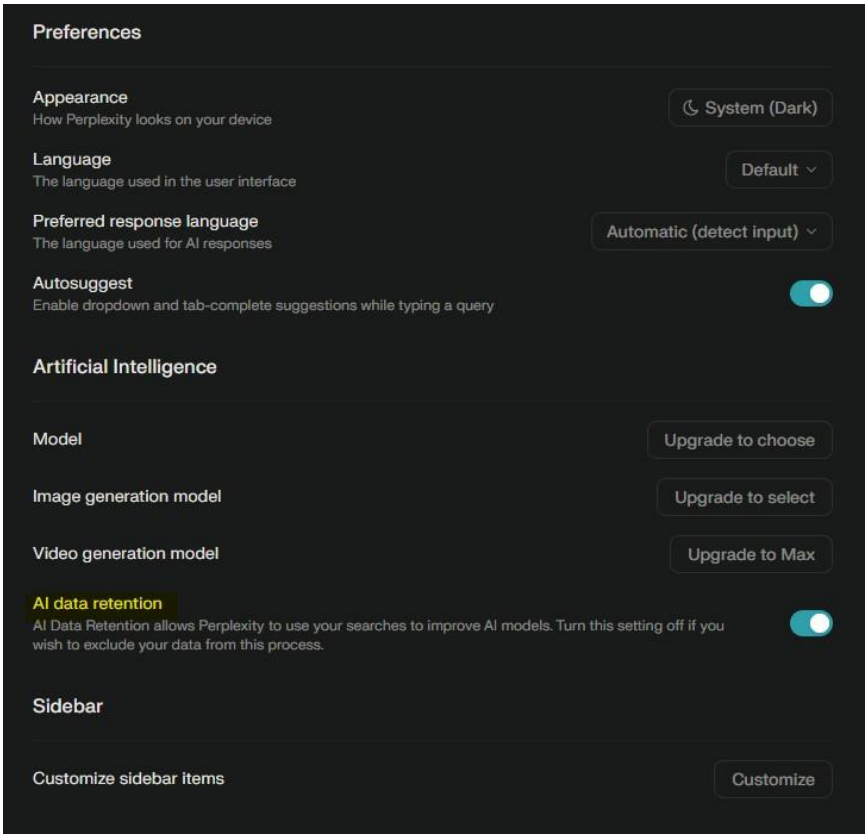


Grok: Settings > Data Controls

Option 2: Perplexity

- Go to perplexity.ai and log in
- Click your profile icon (top right corner)
- Select Settings → AI Settings (or Preferences)
- Find "AI Data Retention"
- **Toggle OFF** this option
- Confirm changes

Screenshot

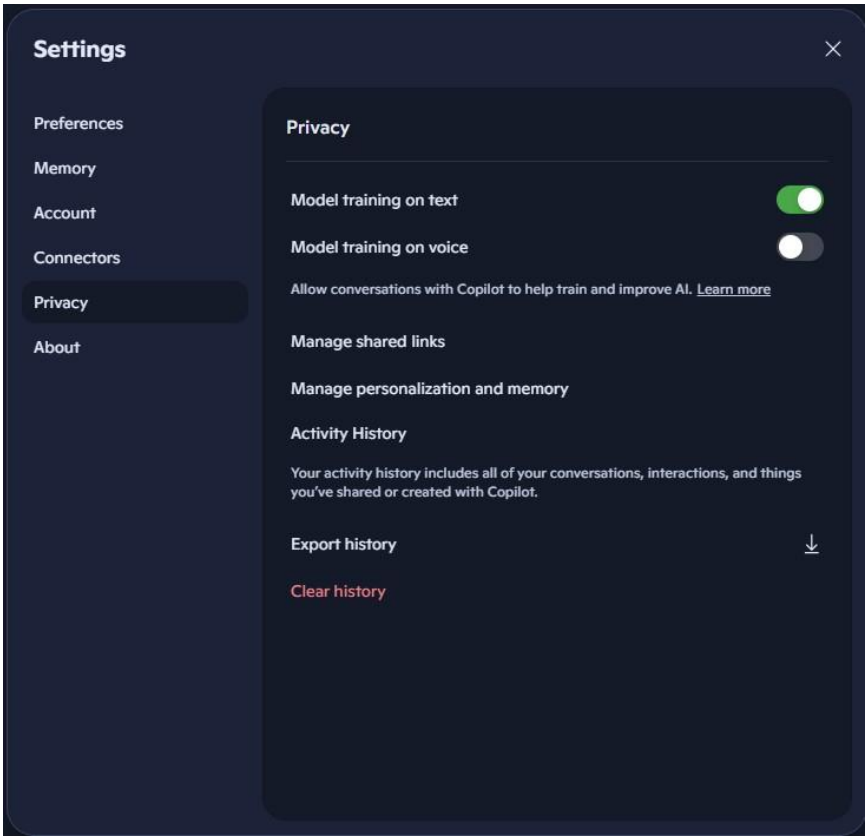


Perplexity: AI Data Retention

Option 3: Microsoft Copilot (Consumer)

- Log into your Microsoft account on copilot.microsoft.com
- Go to Settings → Account → Privacy
- Find "Model Training" or "Optional diagnostic data"
- **Disable** the option to share data for training
- Save preferences

Screenshot



Microsoft Copilot: Privacy > Model training

Option 4: Google Gemini

To better protect your privacy and prevent your conversations from being used to train Google's generative AI models, you need to turn off your Gemini Apps Activity.

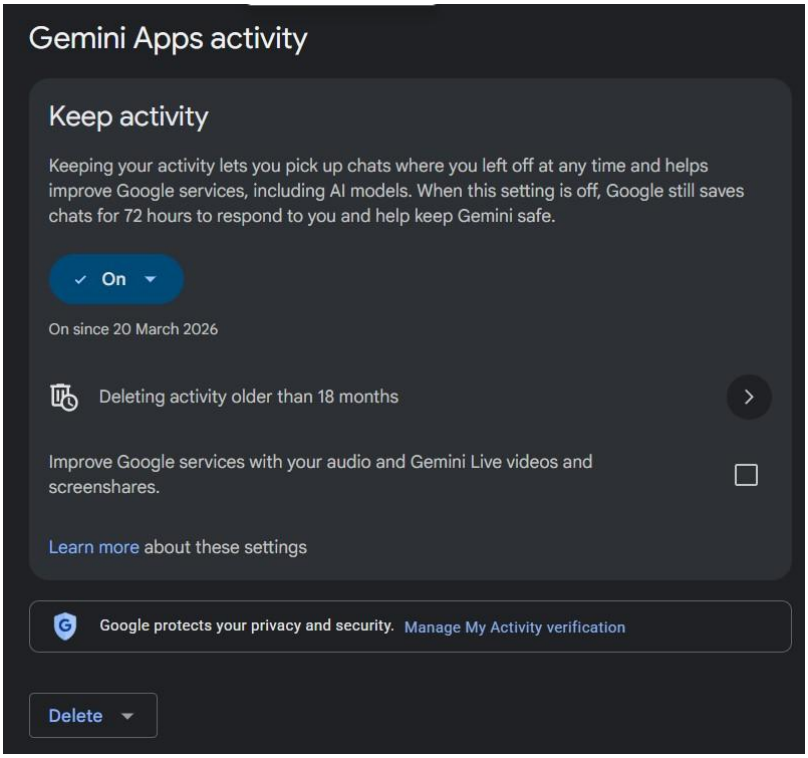
Here is exactly how to do it and what you should keep in mind:

Step 1: Turn Off Future Activity Tracking & Training

- Go directly to the Gemini Apps Activity page.
- Locate the Gemini Apps Activity toggle section at the top.
- Click the Turn off button (or Turn off and delete activity if you want to wipe your past history simultaneously).
- Review the prompt explaining what changes and click Got it or confirm to finalize.

What to expect: Turning this off ensures that your future conversations are not used for AI training. However, it also means Gemini will no longer save a history of your chats, and you will lose access to older conversations once you close them (though Google temporarily retains chats for up to 72 hours on the backend to process the request and maintain service safety before deletion).

Screenshot



Google Gemini: Gemini Apps Activity

⚠ Important Notes

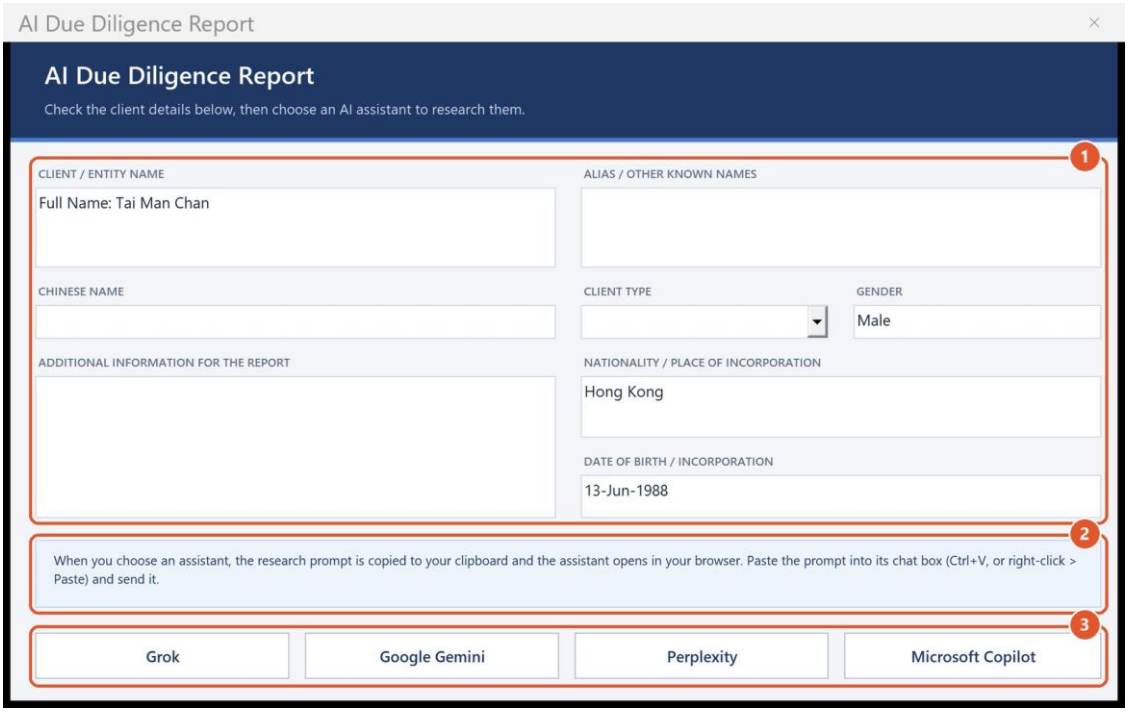
- **Opt-out is per account**: You must disable training for EACH account you use across different platforms
- **Settings may reset**: Check your privacy settings periodically, especially after platform updates
- **No retroactive protection**: Disabling training only prevents FUTURE data from being used; previous conversations may already be in training datasets
- **For maximum protection**: Consider using API access (if available) which typically has stronger data protection guarantees

12.4 How to generate a report

Step 1 – Open the request form. On the Search sheet, double-click column I (AI Due Diligence Report) in the client's row.

5	Database: United Nations Security Council Consolidated List								
6	Client Full Name	Chinese Name	ID Document Number	Gender	Nationality/ Place of Incorporation/ Entity Jurisdiction	Date of Birth/ Date of Incorporation (dd-mm-yyyy)	Entity Name (English/Chinese)	Additional Information for AI Report	AI Due Diligence Report
7					Hong Kong	1/8/2023	Yat Tung Energy Limited		Double Click to Generate
8					Hong Kong	1/8/2023	Pan Pacific Trading Limited		Double Click to Generate
9	Tai Man Chan			Male	Hong Kong	13/6/1988			Double Click to Generate
10	Simon Chan			Male	Hong Kong	14/6/1988			Double Click to Generate
11	Janis Tin Tan Cheung			Female	Hong Kong	13/6/1988			Double Click to Generate
12	Sally Anna Jolie			Female	Argentine	13/6/1977			Double Click to Generate
13	Janis Cheung			Female	Hong Kong	13/6/1988			Double Click to Generate
14	Tin Tan Cheung			Male	Hong Kong	13/6/1988			Double Click to Generate

Double-click "Double Click to Generate" in column I



AI Due Diligence Report form

1	**Client details**	Check and complete the details. Adding the following produces a more thorough report: **Chinese name** – particularly important for clients from Greater China. **Alias / other known names** – any known alternative names. **Additional information** – context about the client's business, the purpose of the transaction or specific risk concerns (see Section 12.6).
2	**How it works**	The research prompt is copied to your clipboard and the assistant opens in your browser.
3	**Choose an assistant**	Grok (recommended), Google Gemini, Perplexity or Microsoft Copilot.

Step 2 – Paste and send. Click into the AI chat box, paste the prompt with **Ctrl+V** (Windows) or **Cmd+V** (Mac), or right-click > Paste, and press Enter.

12.5 What the report contains

Key Search Areas

The report aggregates data across five key risk categories:

- **PEP & Close Associates:** Identification of Politically Exposed Persons and their networks
- **Sanctions Verification:** Checks against major international sanctions lists
- **Adverse Media:** Screening for negative news related to financial crimes
- **Terrorist Financing (TF) Risk:** Analysis based on jurisdiction and high-risk indicators
- **Proliferation Financing (PF) Risk:** Assessment of potential PF exposure

Methodology and Features

Bilingual Intelligence

- Conducts searches in English and Chinese
- Distinguishes between Traditional Chinese (HK/Taiwan/Macau) and Simplified Chinese (Mainland China)
- Applies jurisdiction-specific search criteria

Source Corroboration

- Cross-references findings with at least 2–3 credible sources
- Prioritizes official government websites, court records, and reputable news outlets

Output Format

- Generated in Markdown format for easy pasting word documents
- Includes search timestamps for audit trail purposes

Report structure: section-by-section breakdown

The AI-Generated Due Diligence Report is structured into nine key sections:

Section A: Client Information and Report Metadata

Content

- Legal names (English and Chinese)
- Aliases and other known names
- Gender
- Date of birth / Date of incorporation
- Nationality / Jurisdiction of incorporation
- Relationship type (Individual, Corporation, Trust, Partnership, Charity, Foundation, Other)
- Additional TF/PF context (if provided)
- **Report generation timestamp** (for audit purposes)

Section B: Executive Summary

Content

- High-level synthesis of all findings
- Key risk highlights from PEP, sanctions, adverse media, TF, and PF checks
- Flags for corroborated high-risk elements (e.g., foreign PEP status, direct sanctions matches)

Purpose: Provides a quick overview for decision-makers to assess whether enhanced due diligence is required.

Section C: PEP & Close Associate Analysis

Search Scope

The Tool applies jurisdiction-specific criteria:

Jurisdiction	Screening Focus
Hong Kong	Senior government officials, statutory leaders, political roles (e.g., Chief Executive, LegCo members)
Mainland China	High-level roles in major government and party bodies (e.g., NPC Standing Committee, CPPCC, CPC Central Committee)
Macau & Taiwan	Senior administrative, legislative, judicial, and military roles
International	FATF standards and global leadership registries (such as CIA World Leaders Online Directory)

Methodology

- **Network Mapping:** Identifies family members (spouses, children, parents, siblings) and close business associates
- **Source Verification:** Cross-references official government websites (e.g., gov.hk, legco.gov.hk), reputable news outlets (e.g., SCMP, BBC)
- **Historical Analysis:** Assesses current and past positions to determine de-risking applicability

Report Output

- **No PEP Status:** Clear confirmation if no connections identified
- **Detailed Findings:** If PEP connections exist:
  - Connection mapping table (Name, Relationship, PEP Status, Evidence)
  - Citations and timestamps
  - Preliminary risk classification (Medium for domestic HK PEPs; High for foreign PEPs)

Section D: Sanctions Verification Results

Search Scope

- UN Security Council Consolidated List
- U.S. OFAC SDN and Non-SDN Lists
- EU Consolidated Financial Sanctions List
- The UK Sanctions List
- China Ministry of Foreign Affairs (MOFA) Sanctions

Data Used: Client names (English/Chinese), aliases, DOB, nationality, ID document

Output

- **"No matches found"** or
- **Detailed match information:** Name, list source, reason for designation, match confidence
- Corroborated with at least two independent sources

Risk Contribution: Direct matches elevate overall risk to **High**.

Section E: Adverse Media Findings

Search Scope

- 10+ year historical scan for financial crimes (money laundering, corruption, bribery, fraud, embezzlement)
- Court records and regulatory notices (e.g., China Judgments Online, Hong Kong Judiciary, PACER)

Sources

- At least two credible, independent outlets (e.g., BBC, Reuters, Wall Street Journal, People's Daily, Xinhua)
- Bilingual searches for Chinese-speaking clients
- Social media (e.g., X/Twitter) only if corroborated by traditional media

Output

- **"No material adverse media found"** or
- **Findings grid:**
  - **Source:** Publication name and URL
  - **Veracity:** Verified (court/multiple reports), Credible (single reputable source), Rumour (unsubstantiated)
  - **Materiality:** High (conviction), Medium (allegations), Low (unrelated/outdated)
  - **Summary of Allegation**

Risk Contribution: High-materiality findings elevate overall risk to **High**.

Section F: Terrorist Financing (TF) Risk Analysis

Search Scope

- Links to terrorist entities or designated groups
- High-risk funding channels (e.g., cash-intensive businesses, informal value transfer systems)
- TF-prone regions (per FATF high-risk jurisdictions)
- Incorporating additional data if provided (e.g., transaction patterns, geographic exposure).
- Cross-verified with UN, OFAC, and open-source intelligence

Output

- **Risk Rating:** Low (no links), Medium (indirect exposure), High (direct links)
- **Evidence:** References from FATF mutual evaluations, UN reports

Risk Contribution: High ratings elevate overall risk.

Section G: Proliferation Financing (PF) Risk Analysis

Search Scope

- Involvement in proliferation networks (e.g., North Korea WMD programs)
- Trade in dual-use goods (items with civilian and military applications)
- Cross-verified with UN and open sources

Output

- **Risk Rating:** Low (no links), Medium (indirect exposure), High (direct involvement)
- **Evidence:** References FATF high-risk area lists and UN Panel of Experts reports

Risk Contribution: High ratings elevate overall risk.

Section H: Overall Risk Rating and Narrative

Content

- **Final qualitative rating:** Low, Medium, or High
- **Rationale:** Synthesizes findings from PEP, sanctions, adverse media, TF, and PF analyses
- **Narrative explanation:** Contextualizes the rating without providing specific due diligence recommendations

Note: The report does not prescribe whether to proceed with the client relationship or what level of ongoing monitoring is required. These decisions remain the professional responsibility of the user.

Section I: Source Appendix

Content

- Complete list of all sources consulted (URLs, databases, government registries)
- Access dates and timestamps for each source
- **Purpose:** Provides full transparency and supports regulatory audits

12.6 Terrorist financing and proliferation financing risk

For accurate TF (e.g., terrorist links, high-risk regions like Syria) and PF (e.g., proliferation networks, dual-use goods) analysis, provide targeted details in Column H (Additional Information for AI Report). Examples are given below.

For more accurate and targeted **TF (Terrorist Financing)** and **PF (Proliferation Financing)** analysis, it is strongly recommended to provide specific contextual details in Column H when requesting the AI report.

Why This Matters

The AI relies on the information you provide to conduct focused searches. Without specific input, the AI defaults to general risk indicators from FATF evaluations, which may not capture the unique risk profile of your client. Providing targeted details significantly improves the precision and relevance of Sections F (TF Risk) and G (PF Risk) in the report.

What Information Should You Provide?

Include any of the following details that are relevant to the client or transaction:

1. Transaction Patterns

- Example: "Frequent cash transfers to North Korea"
- Example: "Large wire transfers to shell companies in high-risk jurisdictions"
- Example: "Use of informal value transfer systems (hawala)"

2. Business Nature/Sector

- Example: "Legal services for offshore trusts in high-risk areas"
- Example: "Import/export of dual-use goods (chemicals, electronics)"
- Example: "Cash-intensive business (money exchange, jewellery trading)"

3. Funding Sources/Beneficiaries

- Example: "Links to sanctioned entities or anonymous Middle East donors"
- Example: "Funding received from charities with unclear governance"
- Example: "Beneficial owners located in FATF-listed jurisdictions"

4. Geographic Exposure

- Example: "Operations in FATF-listed high-risk jurisdictions (Iran, North Korea, Syria)"
- Example: "Frequent business travel to conflict zones"
- Example: "Subsidiaries registered in jurisdictions with weak AML controls"

5. Entity Structure

- Example: "Complex partnerships obscuring ultimate beneficial ownership"
- Example: "Use of nominee directors and bearer shares"
- Example: "Multiple layers of offshore holding companies"

How to Input This Information

When generating the report:

- In the Search tab, type the contextual details in Column H (Additional Information for AI Report) for the relevant client row.
- Keep the details factual and relevant to the client or transaction.
- Generate the report by double-clicking Column I (AI Due Diligence Report) for the same row.

The AI will incorporate this information into Section F (TF Risk Analysis) and Section G (PF Risk Analysis) of the report, providing a more tailored and actionable assessment.

What Happens If You Don't Provide Additional Information?

If Column H is left blank, the AI will:

- Rely on general FATF high-risk indicators (e.g., jurisdiction-based risk)
- Provide baseline analysis without transaction-specific context
- May miss nuanced risks specific to your client's situation

Best Practice: Always provide as much relevant context as possible to maximize the quality and usefulness of the TF/PF risk assessment.

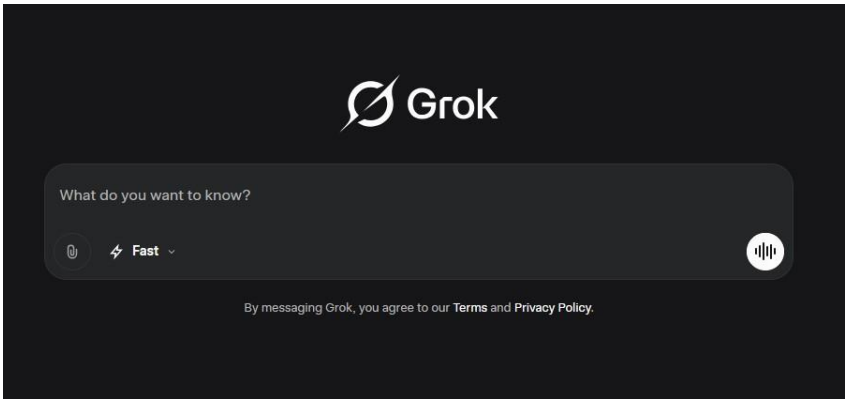
12.7 Getting the best results and saving the report

Optimizing AI Search Settings

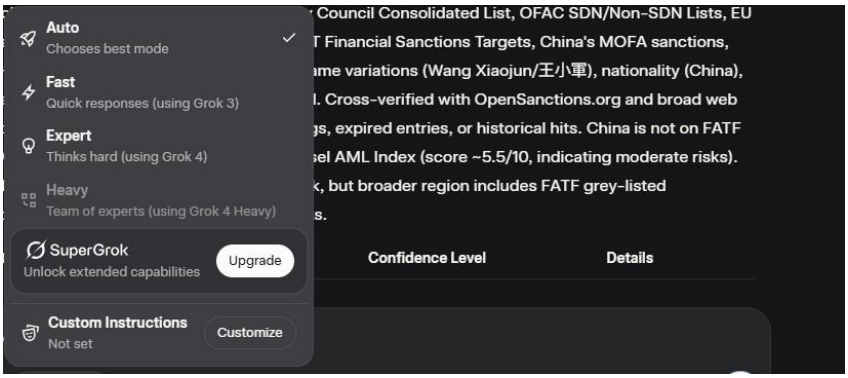
To ensure the most comprehensive and accurate due diligence results, please configure your AI platform settings as follows:

For Grok Users (Recommended Platform)

- If using a free Grok account, select "Expert" mode before pasting your prompt.
- **Expert mode** ensures deeper analysis and more comprehensive search results.

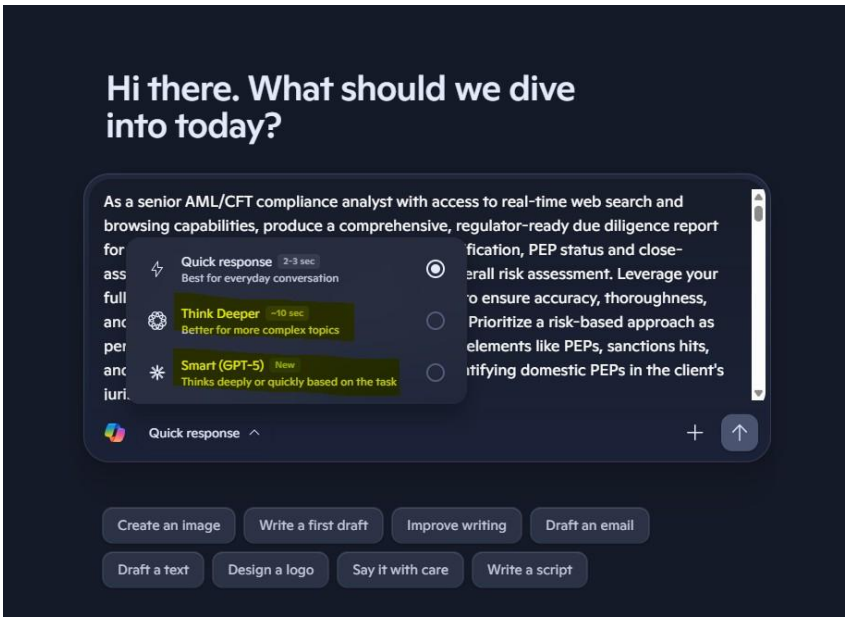


Grok: choose Expert mode



For Microsoft Copilot Users

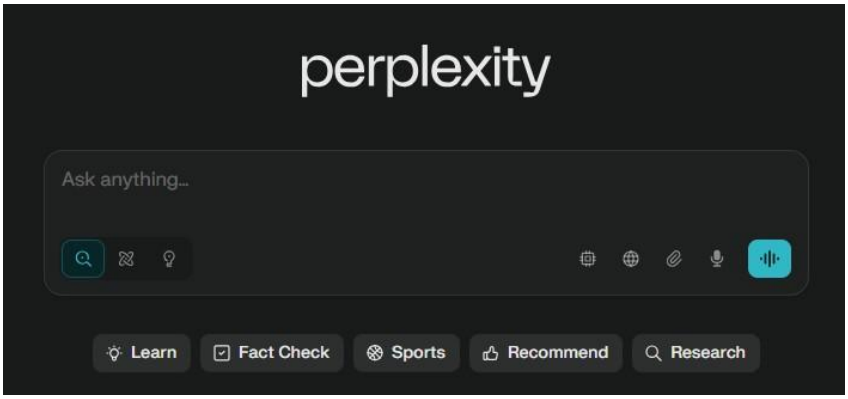
- Enable "Think Deeper" mode to enhance reasoning capabilities and search depth.
- This mode is particularly useful for complex queries involving multiple risk factors.



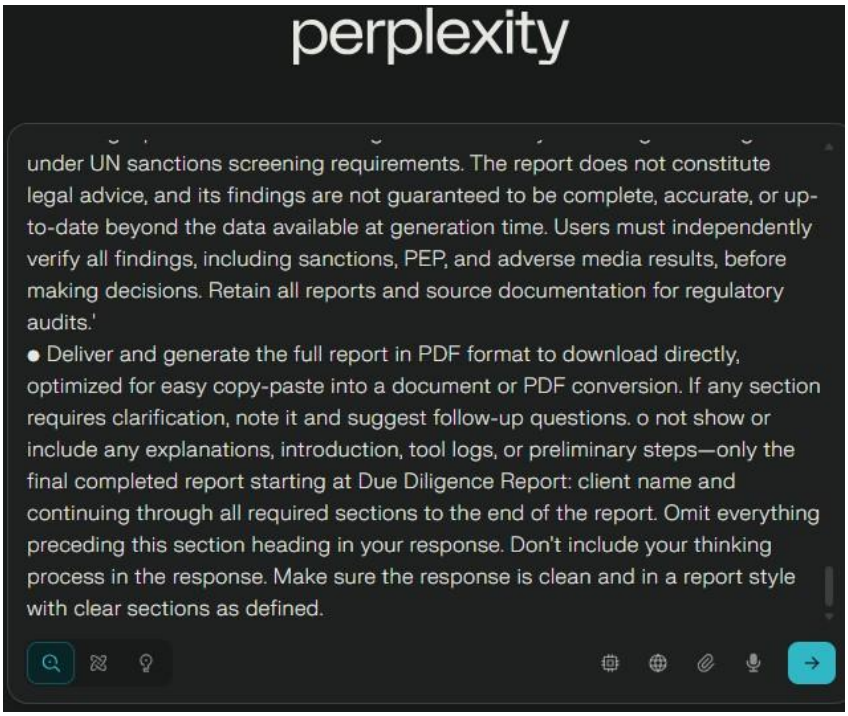
Microsoft Copilot: Think Deeper

For Perplexity Users

- **No specific mode selection is required** for free accounts.
- The standard search function is sufficient for generating the report.



Perplexity: standard search



Retrieving and Saving the Report

Once the AI has completed the analysis and generated the report, follow these steps to save it for record-keeping purposes:

Option 1: Save to Microsoft Word (Recommended for Editing)

Step 1: Select the Report

- Once the report is fully generated in the AI chatbox, highlight and select the entire text of the report.
- Manually drag to select from the beginning to the end of the report.



Select the whole report

Step 2: Copy the Report

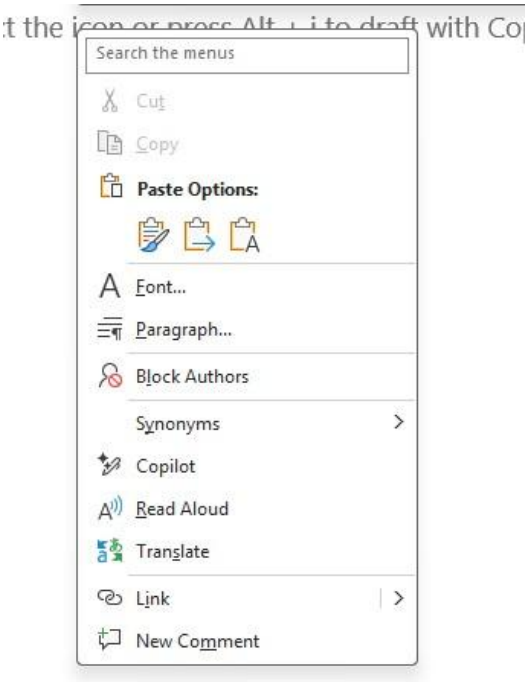
- Press Ctrl+C (or Cmd+C on Mac) to copy the selected text.

Step 3: Open Microsoft Word

- Launch Microsoft Word and create a new blank document.

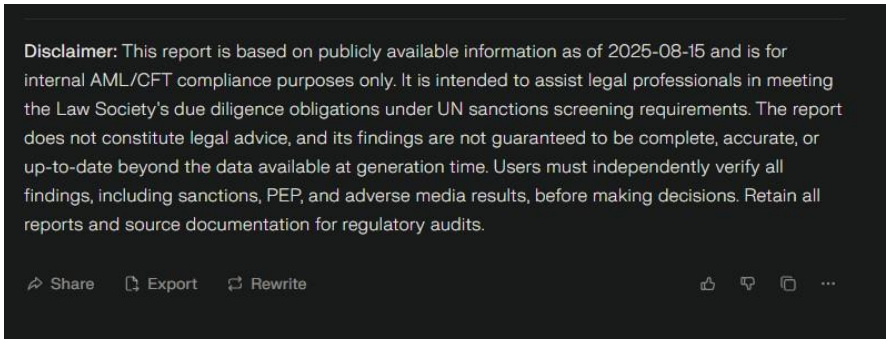
Step 4: Paste with Source Formatting

- Right-click within the Word document.
- Select the "Keep Source Formatting" paste option (look for the icon with a paintbrush or clipboard with formatting).
- This preserves the report's structure, headings, tables, and layout for better readability.

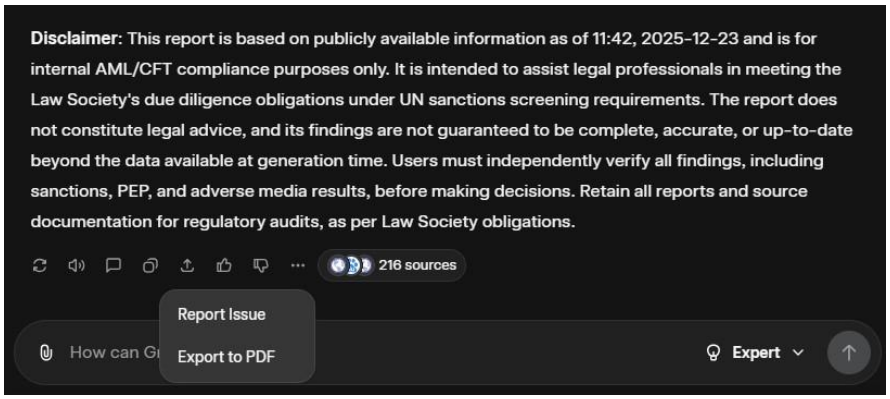


Paste with "Keep Source Formatting"

Option 2: Export Directly to PDF (Alternative Way)



Export / download icon



Important Note on PDF Formatting

Please be aware that PDF export from AI platforms may encounter formatting issues with the generated content. Common issues include:

- Misaligned tables or columns
- Incorrect line breaks or text wrapping

- Missing or improperly rendered special characters
- Inconsistent font sizing or spacing
- Disrupted structure of multi-section reports

Recommendation: We recommend using **Option 1 (Save to Microsoft Word)** as the primary method, as it provides better control over formatting and readability. This allows you to review and adjust the layout before finalizing the document for compliance records.

If you do use PDF export, please

- Review the PDF carefully for formatting integrity before storing it as your compliance record
- Consider maintaining both the Word version and PDF version for audit purposes
- Verify that all critical information (especially the Overall Risk Rating and key findings) is clearly visible and readable

HELP

13 Troubleshooting

What you see	What to do
A yellow notice covers the buttons, or the buttons do nothing	Macros are off. Unblock the file and click Enable Content (Section 3.2). On a Mac, reopen the file and click Enable Macros.
The “last updated” line is red	The last UN list update failed. Check the internet connection and click **Refresh Sanctions Database**.
“You have already entered an individual / entity name in this row”	Each row is either an individual (columns A–B) or an entity (column G). Move one of the names to a new row.
Nothing happens when I double-click a score	The row has no match of 78% or more, or it has not been screened yet. Click **Start Screening** first.
The AI assistant opened but the chat box is empty	The prompt is on your clipboard: click into the chat box and press Ctrl+V (Cmd+V on Mac).
Print shows only part of the report	Use the Print button in the form (not Excel’s File > Print). The report fits the page width on any printer.
Excel asks how to connect to scsanctions.un.org	Your network blocked the direct download. Choose the highlighted address and click Connect (Section 3.2).

NOTE · Need help?

Contact the Law Society’s AML team through the Member Zone.